

DARTMOOR NATIONAL PARK AUTHORITY

2 November 2007

ENVIRONMENTAL APPRAISAL OF MILITARY TRAINING ON DARTMOORReport of the Chief Executive (National Park Officer)Recommendation: That Members:

- (i) **note that the draft Environmental Appraisal does not meet all of the Aspirations of the National Park Authority as agreed on 5 October 2007;**
- (ii) **withhold support for the EA while remaining open to meaningful bi-lateral negotiations prior to or within the Dartmoor Steering Group that deliver additional public benefits as outlined in the Authority's aspirations (NPA 07/071);**
- (iii) **delegate authority to the Chief Executive in consultation with the Chairman, to negotiate with relevant parties to secure the public benefits as outlined in the Authority's aspirations and report on progress made.**

1 Introduction

1.1 Members have received previous reports (NPA/06/039, 07/003, 07/017 and 07/071) concerning the Defence Training Estate's project 'Sustainable Military Training on Dartmoor (SMToD)'. The last report, which was agreed at the meeting on 5 October 2007, set out the Authority's own aspirations as regards public benefit gains to be sought, principally in relation to any licence renewal negotiations that may take place. The intention was to 'measure' these aspirations against the draft Environmental Appraisal.

2 Background

2.1 The Public Inquiry chaired by Lady Sharp into the continued use of Dartmoor by the Ministry of Defence found that military training and a national park are "discordant, incongruous and inconsistent" but not necessarily incompatible¹; a view upheld in the Government's response². The report of the National Parks Review Panel (1991) proposed that military use of land in the national parks should be regarded in principle as "discordant, incongruous and inconsistent" with national park purposes; that live firing should be removed from the Parks as quickly as possible; and high priority and urgency should be given to removing live firing from Dartmoor³.

2.2 The National Park Authority has, as evidenced by both the current and emerging Management Plan for Dartmoor National Park, taken a pragmatic approach. Given the long history of military training on the Moor, and also the critical importance to our armed forces of appropriate training environments, the Authority has sought to work with MoD to reduce and mitigate the adverse effects of continued existence of the

Dartmoor Training Area (DTA) whilst working towards the ultimate withdrawal of military use damaging to national park purposes on Dartmoor. Much has been achieved in this regard over recent years (as documented in the Environmental Appraisal [EA]) and this is testimony to the close working relationship that has evolved between the Authority and the military.

2.3 It is against this backdrop of:

- fundamental conflict between national park purposes and military training;
- pragmatic and effective partnership working; and
- an overarching aim that military training damaging to national park purposes should cease,

that the Authority approached the current process of potential licence re-negotiation. The aim was to use this process as an opportunity for further reconciliation between conflicting principles, priorities and outcomes.

2.4 Prior to any re-negotiation of the licence for the Dartmoor Training Area (DTA), the Secretaries of State for Defence and for Environment, Food and Rural Affairs (Defra) require confirmation that:

- There is a clear military need for military training on Dartmoor; and
- The management of DTA for military activities will continue to be sensitive to environmental, farming and public access issues and is thus sustainable in the long term.

2.5 The need for military training on DTA has been addressed through studies commissioned by Defence Estates that have looked separately at both the continuing need to train on DTA and the need for military training on the Defence Training Estate in the South West of England (with similar exercises for other regions). There has been no 'independent' inquiry into or assessment of training land requirements across the whole of the UK. It is also worth noting that the MoD has identified a shortfall in light force training area capacity in the UK and this, coupled with the return of 20,000 troops to the UK from permanent bases overseas, could exert further pressure on existing training areas/facilities. As noted in NPA 07/071, the implications of the Parliamentary Defence Committee report published in September 2007 which called for the MoD to set out how it will address concerns about the potential for rationalisation of the Defence Training Estate to lead to intensified use of National Parks for military training remain unclear.

3 Environmental Appraisal of Dartmoor Training Area

3.1 The draft Environmental Appraisal, which was published on the Dartmoor Ranges website (http://www.dartmoor-ranges.co.uk/environmental_assessment_1.html#EA) on 8 October, seeks to appraise the environmental effects of military training and identify measures to manage any adverse effects so as to avoid or minimise them (mitigation measures). The overall conclusion from the draft EA is that military training on DTA is not having a significant impact on the environment (see table 1 for a summary of the conclusions) – the only area with complete data that records a significant negative impact is public access.

Table 1: Key Conclusions from the Environmental Appraisal of Dartmoor Training Area

Topic Area	Nature of Impact as described in the EA
Air Quality	Air quality at and around DTA was good and did not exceed Air Quality Objectives set out in national legislation
Cultural Heritage	No significant impact
Landscape and Visual	Military activity is not having a significant effect on landscape character nor tranquillity.
Land Use	Additional measures to manage land use effects from military training have been identified (eg review of payments to local people and consideration of measures to minimise stock movement)
Nature Conservation	<p>Military training activities are not considered to be having a significant effect on blanket bog habitats and current management measures ensure that erosion effects are minimised.</p> <p>Silt in water draining from DTA is not having an effect on migratory spawning fish species.</p> <p>Noise from military activities is not having an effect on breeding birds.</p>
Noise	Noise effects are not considered to be significant.
Public Access	<p>Effects on members of the public because of access restrictions when live firing is taking place are considered to be significant. However, if all the suggested alterations were made to the firing calendar it would be impossible for the MoD to maintain a viable firing programme and therefore it has been concluded that the current calendar represents the best compromise. Minor local amendments to the firing calendar may be made in the future as a result of specific requests from organisations.</p> <p>The effects on the public because of limited access to areas of particular interest (Yes Tor, High Wilhays, Tavy Cleave) are not considered to be significant.</p> <p>The effects of dry training on public access are not considered to be significant.</p> <p>Startle effects on members of the public on DTA from aircraft in support of training by ground troops are not considered to be significant.</p>
Socio-economics	<p>This section is incomplete, awaiting further data.</p> <p>Effects on tourists and regular visitors to DTA resulting from the presence of the military are not considered to be significant.</p>
Soils, Geology and Groundwater	<p>Assessment shows that the risk to the public from contaminants, such as fuels and heating oils, is low.</p> <p>Although clearance of UXO (Unexploded Ordnance) is undertaken when appropriate, the possibility of clearing UXO from all of DTA is not considered feasible.</p>
Surface Water	Military training activities are not having an effect on water quality.

Traffic and Transport	Traffic associated with military activities is not considered to be a significant component of traffic flows on the highway network in and around DTA.
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- 3.2 The draft EA does not set out any clear appraisal of options in terms of type and intensity of military use, it concentrates on assessing the impact of the 'status quo'. It is not clear how National Park designation was weighted in the assessment of impacts, nor is there detailed reference to the implications of the Section 62 on public bodies to have regard to National Park purposes.
- 3.3 Appendix A 'assesses' the Aspirations agreed by the Authority at its meeting on 5 October 2007 (paper NPA 07/071) against the conclusions and recommendations of the draft EA. The 'analysis' presented in Appendix A indicates that there is little progress on many of the Authority's Aspirations, and the public and environmental benefits they seek to deliver are either considered by the EA to be 'unachievable' in terms of the current or future planned use of DTA by the military, or are not addressed in sufficient detail through proposed additional mitigation measures. There is a clear need for a detailed dialogue with relevant parts of the MoD to determine the appropriate level of military use that would deliver the maximum public benefit.

4 Conclusion

The Authority's standpoint has always been based on the fact that, by its very nature, military training on Dartmoor is intrinsically alien to and in conflict with National Park purposes. The Authority's aim is to use the opportunity that the potential licence re-negotiation presents to move forward from the current situation and seek to further reconcile some of the negative impacts of military training on Dartmoor National Park. The Authority's list of aspirations sets out the areas in which change is believed desirable and the nature of the change sought. Unfortunately, the draft EA fails to look in detail at many of these aspirations or offer any detail on how the public and environmental benefits could be achieved. As such, the EA represents a potential missed opportunity for considering how different training facility options could deliver against the framework of the Authority's aspirations and cannot be endorsed as an appropriate basis upon which to consider any licence renewal negotiations.

5 Implications for People in Under-represented Groups

None

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Background Papers

- National Park Authority Reports NPA/06/039 (June 2006), 07/003 (January 2007), 07/017 (March 2007) and 07/071 (October 2007).

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¹ Sharp (1977) *Report of the Non-Statutory Inquiry into the continued use of Dartmoor for Military Training*, HMSO, London. p.77.

² Secretary of State for the Environment and Secretary of State for Defence (1977) *Statement on the Non-Statutory Inquiry by the Baroness Sharp into the continued use of Dartmoor for Military Training*, Cmnd 6837, HMSO, London.

³ National Parks Review Panel (1991) *Fit for the Future – Report of the National Parks Review Panel*, Countryside Commission, Cheltenham. p.83.

APPENDIX 1: ASSESSING THE NATIONAL PARK AUTHORITY’S ASPIRATIONS AGAINST THE ENVIRONMENTAL APPRAISAL OF THE DARTMOOR TRAINING AREA

ASPIRATION	JUSTIFICATION	EA RESULTS	COMMENTARY
<p>1 Range Boundaries</p> <p>The area and configuration of the live firing ranges to be kept under continuous review in order to maximise recreational access opportunity</p>	<p>The principal conflict between military training and National Park purposes is the access restrictions at times of live firing</p>	<p>“Effects on members of the public because of access restrictions when live firing is taking place are considered to be significant” (p.vii)</p>	<p>No specific commitment</p>
<p>a) Improvements to access on Okehampton Range</p> <p>An adjustment to the boundary of Okehampton Range to enable access to the summits of Yes Tor and High Willhays at all times</p> <p>Detailed arrangements would need to reflect the requirement to minimise disturbance to moorland breeding birds</p>	<p>Yes Tor and High Willhays are the highest peaks in southern England and the National Park’s iconic summits to which the public should have unfettered access</p> <p>The low usage of the Okehampton range, and the available firing templates within that Range, suggest that exclusions of Yes Tor and High Willhays should be feasible, if inconvenient. The RPS report notes that some small realignments of</p>	<p>“The effects on the public because of limited access to areas of particular interest (Yes Tor, High Willhays, Tavy Cleave) are not considered to be significant” (p.vii) The MoD has examined the possibility of opening these areas to permanent access. However, the reduction in utility of the ranges that would result were access to be extended precludes this option from being adopted, however as access to Yes Tor and High Willhays is already guaranteed on 245 days each year this is not considered to be significant”.</p> <p>Para 9.5.90 states that Natural</p>	<p>Permanent access to Yes Tor and High Willhays is ruled out on grounds on reduced utility of the ranges and extent of current access.</p> <p>The EA also notes that the area has been recently used by breeding Ring Ouzels and states that DNPA has highlighted the potential for disturbance should increased access be permitted. This mis-represents our position – which was to call for an assessment of the likely changes in use if these areas were taken out of the ranges and scope for</p>

ASPIRATION	JUSTIFICATION	EA RESULTS	COMMENTARY
	the range safety boundaries might be possible to improve access opportunities	England and DNPA have highlighted the potential for increased disturbance of breeding Ring Ouzel should increased access be allowed.	influencing the pattern of public use through information/interpretation.
<p>b) Access to Tavy Cleave</p> <p>A significant increase in the availability of public access to Tavy Cleave.</p> <p>Detailed arrangements would need to reflect the requirement to minimise disturbance to moorland breeding birds</p>	Tavy Cleave is one of the most spectacular river gorges on Dartmoor, a route to the high moor, and an acknowledged jewel in the Dartmoor landscape	<p>“Increasing access to Tavy Cleave could have effects on breeding birds which are present in this area” (p.viii)</p> <p>A further study of the gallery range at Willsworthy is to be undertaken in order to determine whether the range template type can be changed to allow more access.</p>	No indication that additional access would be feasible within current operational programmes but further study is ongoing and due to report in mid 2008.
<p>2 Timing of live firing</p> <p>All of June, July, August and September and every Monday to be non firing days on all three ranges</p>	June to September are the most popular months for walking on Dartmoor. Extension to June and the whole of September would meet aspirations from visitors who are not restricted to school holidays	<p>“...consideration has been given to altering the firing calendar in order to change the times of year when public access is guaranteed. However, if all the suggested alterations were made to the firing calendar it would be impossible for the MoD to maintain a viable firing programme and therefore it has been concluded that the current calendar represents the best compromise” (p.vii)</p> <p>“Minor local amendments to the firing calendar may be made in the future as a result of specific requests from organisations” (p.vii)</p>	No specific proposals for amending the firing calendar as per the aspiration are contained in the EA.

ASPIRATION	JUSTIFICATION	EA RESULTS	COMMENTARY
<p>3 Public Information</p> <p>Information on the availability of access</p> <p>Continuous improvements in the way information about access is presented (ie in a more positive and welcoming way, and in a more informative way), building on the six weeks advanced notice of training and with fewer short-notice cancellations.</p> <p>To achieve change to OS Explorer series maps to depict the range area as access land to which there are restrictions when training is taking place</p>	<p>To maximise opportunities for public access and enjoyment in line with National Park purposes. To enable guided walks and events leaders to plan further ahead with more confidence.</p> <p>Response to issue identified by Dartmoor Access Forum</p>	<p>No extension to the six weeks advanced notification of live firing on grounds that "...whilst the time available to the public would remain broadly the same there is potential for disruption as this extended timescale would reduce military flexibility" (p.viii). "...improved information will be provided about dry training and dry training near popular locations during peak visitor times will be discouraged" (p.viii) "...mapped information will remain the same for safety reasons. ...the proposed mitigation is to improve the interpretation information about military training in the local area around the DTA" (p.viii)</p>	<p>Extension to the six week notification period and depiction of the DTA as access land are ruled out.</p> <p>Draft EA proposes increased and clearer information.</p> <p>Training will be programmed to avoid agreed honey pot sites when the public are likely to be making extensive use of them.</p>
<p>4 Dry Training</p> <p>An assessment of the impact of dry training on the public interest</p>	<p>Consistent levels of concern expressed by the public, and the principal area of complaints from the local community. Dry training and recreation use of Dartmoor are not wholly compatible</p>	<p>"The effects of dry training on public access are not considered to be significant" (p.viii)</p>	<p>Dry training is not deemed to have a significant impact on public access.</p>

ASPIRATION	JUSTIFICATION	EA RESULTS	COMMENTARY
	<p>and visitors can be intimidated by the noisier activities. There are particular concerns around frightening horses with implications for safety</p>		
<p>a) Timing of dry training</p> <p>No dry training activities on Saturdays, Sundays and Bank Holidays</p>	<p>Dry training should be limited in the most popular areas and at times of greatest visitor use so reducing conflicts of interest and enhancing the visitor experience in relation to the special qualities of Dartmoor.</p>	<p>“...improved information will be provided about dry training and dry training near popular locations during peak visitor times will be discouraged. Therefore, there will be no significant effects on the public as those wishing to visit popular locations during peak tourist periods will not be disturbed by dry training as it will not be taking place at these areas”. (p.viii)</p> <p>“Startle effects on members of the public on DTA from aircraft in support of training by ground troops are not considered to be significant. Mitigation has been identified which will help to provide more information to the public about the use of aircraft in support of ground troops and improve the visibility of riders and as well as ensuring pilots are briefed regarding potential startle effects on horses and riders” (p.viii)</p>	<p>Some movement but need to ascertain further details on mitigation measures proposed.</p>

ASPIRATION	JUSTIFICATION	EA RESULTS	COMMENTARY
<p>b) Scope of dry training</p> <p>Codes of practice to be agreed covering pyrotechnics and blank firing.</p>	<p>To reduce impacts on the visitor experience</p>		<p>A training DVD is proposed to reinforce DTE SW Standing Orders and to inform troops about National Park purposes.</p>
<p>c) Location of dry training</p> <p>As far as possible, dry training to be located away from a schedule of popular public places and relocated to the live firing ranges</p>	<p>To enable the public to plan their visits to avoid conflict, or to reduce the surprise factor when caught up in exercises</p>		<p>Training will be programmed to avoid agreed honey pot sites when the public are likely to be making extensive use of them. Dry training to avoid honey pot sites during popular times of the year. Dry training will NOT be relocated to live firing ranges.</p>
<p>d) Better public information</p> <p>Better public information on what dry training is and visitors are likely to experience, where the dry training areas are, and when dry training is taking place. To include special warning and risk reduction for horse riders.</p>	<p>To enable the public to plan their visits to avoid conflict, or to reduce the surprise factor when caught up in exercises</p>		<p>Proposed mitigation includes suggestions for some improvements to information provision (eg review of existing interpretation boards, consideration of improvement to High Moorland Visitor Centre display etc.) and proposals for better briefing of helicopter pilots to avoid horse riders and stock etc.</p>

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<p>5 Constraints on helicopter movements associated with military training on Dartmoor</p> <p>A significant reduction in helicopter flying impacts, with no flights on Saturdays, Sundays and Bank Holidays and no increase in intrusive noise from large helicopters</p> <p>Significant flying operational intentions to be advised in advance to DNPA and made publicly available</p> <p>A voluntary code of operations to be agreed covering avoidance of sensitive areas, limiting the number of flights in any one location, and to improve communications</p>	<p>To reduce the significant noise impact and disturbance to visitors, local communities, livestock and horses from helicopter flying, avoiding use of helicopters entirely on those days when recreational use of Dartmoor is at its highest so ensuring tranquillity which is an important attribute of the National Park and a Management Plan goal</p> <p>Advance notice would help in identifying whether public complaints are related to military helicopters</p>	<p>“Startle effects on members of the public on DTA from aircraft in support of training by ground troops are not considered to be significant. Mitigation has been identified which will help to provide more information to the public about the use of aircraft in support of ground troops and improve the visibility of riders and as well as ensuring pilots are briefed regarding potential startle effects on horses and riders” (p.viii)</p>	<p>No commitment to no fly times or specific voluntary code of operations but some additional mitigation measures identified, including:</p> <p>Firing Notice to give details of ground exercises which will employ 4 or more aircraft; and support for ‘Operation Bright Eyes’</p>
<p>6 Military infrastructure</p> <p>To continue to reduce the impact of military roads, tracks, buildings and paraphernalia on the Dartmoor landscape</p>	<p>The landscape quality of the National Park is of paramount significance, and all intrusions should be at a minimum</p>		

ASPIRATION	JUSTIFICATION	EA RESULTS	COMMENTARY
<p>a) Landscape quality</p> <p>A review of range safety infrastructure and its continuing need with a view to a reduction in the number of visually intrusive items such as observation posts and lookouts, flagpoles and other boundary markers, and notices, and a softening of the impact of those that remain, subject to agreement as to structures which should be safeguarded for their historic interest</p> <p>Where observation posts and lookouts are renewed, replacements to be appropriately designed, recognising the desire for eventual removal in a way which will cause the least damage to the environment</p>	<p>Military infrastructure is visually intrusive in the open landscapes of Dartmoor and inconsistent with the purposes of National Park designation</p>	<p>Whilst noting that the Appraisal has established that “military activity is not having a significant effect on landscape character “ (p.v) the EA identifies a number of additional mitigation and compensation measures, for example:</p> <ul style="list-style-type: none"> • Better shielding of lights • Reduce visual effect of FPs • Consider mobile Ops • Potential improvements to a range of Ops and other features (see p.62) 	<p>Some potential movement towards reducing further the impact of military infrastructure through identification of additional mitigation measures.</p>
<p>b) Track Maintenance</p> <p>Retain the number and length of tracks required for military vehicular access at a minimum</p> <p>Appropriate materials and maintenance techniques to be used to soften landscape impacts.</p>	<p>Track maintenance should utilise materials which are appropriate to their locality in terms of visual impact and impacts on ecology</p>		<p>No specific commitment to reduce the number of number and/or length of military tracks. Annual consultation on an agreed programme of works is already in place.</p>

ASPIRATION	JUSTIFICATION	EA RESULTS	COMMENTARY
Annual consultation through the Dartmoor Working Party on an agreed programme of works			
<p>c) Okehampton Loop Road</p> <p>A Project Body to be set up to resolve the future of the Loop Road</p> <p>Consideration to be given to the Loop Road being resurfaced as far as Newbridge in the west and OP22 in the east and retained beyond for cyclists and for access for the less able</p>	<p>This is a long standing issue and a difficult area where there are conflicting views on what should be done. The renewal of the licence is an opportunity to agree a way forward once and for all. The current state of the road discriminates in favour of 4WD users. Public resources for resurfacing the road are not applicable. The opportunity for the elderly and less mobile to experience a flavour of high Dartmoor should be retained. There is no public legal right of access to use the road</p>	<p>N/A - Excluded from the EA at the scoping stage</p>	<p>Excluded from the EA at the scoping stage</p>
<p>d) Okehampton Camp</p> <p>A strategy for on-going investment at the Camp to be agreed, including a periodic programme for buildings maintenance / refurbishment and</p>	<p>An ongoing programme of environmental improvements including, for example, conservation of historic features, landscaping,</p>	<p>Lack of detail and reference to Okehampton Camp Landscape Management Plan</p>	

ASPIRATION	JUSTIFICATION	EA RESULTS	COMMENTARY
possible replacement and a package of environmental improvement measures to be implemented over a set period	enhancing wildlife habitats and environmental management improvements such as reducing energy use and light pollution would be consistent with the MoD's responsibilities under S62		
<p>7 Damage</p> <p>Physical damage caused by military training to be eliminated</p>			
<p>a) Digging in, stone shelters, and other physically damaging activity</p> <p>Current guidance and controls to be rigorously enforced, and strengthened if indicated, in order to avoid incidents and complaints</p>	<p>Sporadic reports of damage continue and it is essential to increase safeguards for archaeology, important landscape features and wildlife habitats, and for livestock</p>	<p>Not considered to have a significant effect on the landscape and no additional mitigation measures identified. "Existing SOs state that where digging is permitted, heather areas are to be avoided and ground reinstated as soon as possible after the exercise is completed. Also no bivouacking is to take place in heather areas" (para 7.5.39, p.73). Bivouacking is also excluded from within 20m of areas of archaeological significance.</p>	<p>Some additional mitigation proposed including use of national Vegetation Classification to create ecological sensitivity maps that can be used to inform the location of digging activities.</p>

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<p>b) Range Telephone System</p> <p>To keep the continuing need for this system under review. For as long as the system has to be retained, agreement on reducing the environmental impact of repairs</p>	<p>To increase safeguards for archaeology, important landscape features and wildlife habitats, and for livestock</p>	<p>No reference to range telephone system in the EA</p>	<p>No specific commitment within the EA.</p>
<p>c) Tracked vehicles – Viking and BV 206</p> <p>Limit use of all tracked vehicles, Viking and BV206, to hard tracks only</p>	<p>To eliminate damage to moorland SACs and avoid erosion impacts, and to reduce visual impact and creation of new access/stock movement routes</p>	<p>Routes for BV206 and VIKING vehicles already have to be agreed with Comdt DTA. “the effects of tracked vehicles will be dealt with through an Appropriate Assessment” (para 9.4.2, p.114) but no further mitigation measures proposed.</p> <p>The AA would seem to be dependent upon the recent NVC surveys, the methodology of which just states that notes on military training impacts were recorded and no maps show of where this occurred.</p>	<p>No commitment. Use of tracked vehicles is limited to BV206 (and variants thereof) and subject to a forthcoming Appropriate Assessment but not clear that the information required for such an assessment is available.</p>
<p>d) Other vehicles</p> <p>All non-essential use prohibited, including at non-firing times with vehicles continuing to be</p>	<p>To reduce the potential for damage to moorland SSSIs, avoid erosion impacts, and</p>	<p>“Existing SOs generally limit vehicles to permitted roads and tracks although in some cases vehicles are</p>	<p>No additional mitigation identified – existing arrangements require drivers to seek authority from</p>

ASPIRATION	JUSTIFICATION	EA RESULTS	COMMENTARY
restricted to hard tracks, and clearly identified at all times	improve the visitor experience by reducing the military presence	allowed to move off the road". (para 7.5.40)	Comdt DTA, Training Area Marshalls or Supervisors before they drive off track
<p>8 Disturbance</p> <p>Minimise disturbance to conservation interests and fellow users of moorland Dartmoor</p>	<p>Appropriate guidance and good practice should apply to all users of Dartmoor, recognising that this is likely to be different for different groups</p>		
<p>a) Moorland breeding birds</p> <p>Appropriate guidance and good practice restrictions to be applied and enforced in order to safeguard rare ground nesting moorland birds, including voluntary avoidance</p>	<p>Important concentrations of nationally scarce moorland breeding birds are found on Dartmoor. This action would aid conservation of BAP species</p> <p>Recreational events, public access, and moorland management activities, together with military training, should follow the same guidance and good practice restrictions with respect to moorland birds</p>	<p>EA focuses on the issue of disturbance from noise and states that: "...results from the breeding birds surveys across DTA indicate that noise from military activities are not having an effect on breeding birds" (p. vii)</p> <p>Para 9.4.2 (p.114)</p>	<p>Much emphasis is placed on the recent survey of breeding birds that was undertaken for the ranges. This document provides comprehensive distribution maps for moorland birds in these areas, but it does not, as appears to be claimed throughout the EA, provide evidence that there is no significant impact from military activities on the bird populations. In many places throughout the document 'sensitive' bird nesting areas should more accurately read 'rare' bird nesting areas.</p>

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<p>b) Adventurous training, particularly outside the DTA</p> <p>Adventurous training activities to comply with current DNPA recreational codes of guidance in all appropriate ways</p>	<p>To minimise environmental impact and particularly impact on moorland breeding birds and apply consistent guidance across all potentially disturbing activities</p>		<p>Some additional mitigation is proposed to include production of cultural heritage sensitivity map to guide no dig areas, out of bound areas etc.</p>
<p>9 Unexploded ordnance</p> <p>Programmes of clearance of unexploded ordnance to be agreed at appropriate intervals to support where necessary the creation of firebreaks and better moorland management</p> <p>Further clearance to be based on public risk assessment and executed without damage to the environment</p> <p>Detailed programme and implementation arrangements to be agreed with DNPA staff and rangers to ensure safeguards</p>	<p>A targeted programme of clearing unexploded ordnance would assist moorland conservation management</p> <p>Sensitive archaeological sites in particular must be safeguarded.</p>	<p>The disadvantages of clearing DTA of unexploded ordnance as identified by the MoD are set out on p.223. The conclusion reached is that clearance as a single project (as opposed to ongoing removal of UXO that becomes visible), is not considered by the MoD to be feasible.</p> <p>The EA contains the following statement: “For the purpose of the EA, it is therefore assumed that conditions, in terms of the presence of UXO, will not change significantly” (para. 13.5.39, p.224).</p>	<p>No change in the removal of UXO appears to be envisaged</p>

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<p>10 Licences</p> <p>A requirement for periodic reviews should be built into any new or renewed licences, such reviews to include military training needs and delivery of environmental and social objectives</p> <p>Licences should be underpinned by arrangements for positive action or management plans which deliver ancillary public benefits</p> <p>Such arrangements might best be timed to coincide with the period of the National Park Management Plan</p>	<p>Periodic reviews are necessary because of the likely pace of change in training requirements, and changing environmental and other demands on Dartmoor</p>	<p>Not covered in the EA.</p>	<p>Not covered in the EA.</p>
<p>11 Supporting environmental and social objectives on Dartmoor</p> <p>To build on the long record of support from the MoD for National Park purposes and for the local community</p>	<p>To maximise the environmental and socio-economic contributions of the Defence Training Estate to the delivering National Park purposes and to supporting the local community</p>		<p>MOD's use of Dartmoor results in £560k being spent on training rights and training on private land and £224k on commoners disturbance payments (but see comments on local procurement).</p>

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<p>a) Delivery of conservation initiatives by the MoD</p> <p>Building on the valuable work currently undertaken by the MoD, a commitment to provide enhanced assistance in cash or in kind to deliver agreed priority conservation initiatives, including improving moorland management. An annual programme to be established through the DWP</p> <p>An annual programme of assistance to the DNPA or to other statutory bodies (eg English Heritage, Natural England) and to the voluntary sector</p>	<p>This would demonstrate the MoD's commitment to the highest standards of environmental stewardship on the Defence Estate and would deliver its obligations under S62 of the Environment Act 1995</p> <p>This issue is regarded as particularly important as Landmarc is widely perceived as being less helpful than Defence Estates used to be</p>		<p>The EA suggests that delivery of conservation initiatives by the MoD will continue but there is no detail and no commitment to an annual programme or similar.</p>
<p>b) Local Procurement</p> <p>Services and goods to be procured wherever possible from within the local community. Local employment opportunity should be sustained, and sufficient capacity retained to fully deliver the Integrated Land Management Plan, and Licence obligations and commitments</p>	<p>To maximise economic gain from the military presence within the local community</p>	<p>The socio-economic section of the EA is not yet complete. Information on 'soldier spend' is still to be collected and thus a total economic effect can not be calculated.</p> <p>The EA looks at existing spend profiles and does not look in any detail at maximising the multiplier effect of its expenditure.</p>	<p>The definition of local is not clear and there is no detail on how the local multiplier effects of Defence Estates expenditure could be maximised.</p> <p>There is a lack of detail on procurement of food with the stated aim being to procure food locally 'wherever possible'.</p>

ASPIRATION	JUSTIFICATION	EA RESULTS	COMMENTARY
<p>c) Application of licence revenues</p> <p>A programme of works to be agreed and supported by licence revenues</p>	<p>To offset the impacts of military training by enhanced conservation and access works across Dartmoor</p>	<p>Not covered in the EA.</p>	<p>This aspiration is aimed more at the Duchy of Cornwall than the MoD.</p>
<p>d) Adaptations to the Ten Tors event to safeguard National Park and Commoners' interests</p> <p>Completion of the Brigadier's (HQ Wessex Bde) review of the Ten Tors event, including its format, timing and execution, to facilitate continuous adaptation where desirable, and as to be endorsed by the Dartmoor Steering Group.</p>	<p>To bring about closer consistency with guidance for other events and activities on Dartmoor to reduce the impact of the event, eg in terms of physical erosion of the moor, disturbance to moorland breeding birds, and impacts on graziers</p>	<p>Not included in the scope of the EA</p>	<p>Subject to separate study</p>
<p>12 Relationships</p> <p>To build upon the close working and harmonious relationships currently enjoyed, especially in order to deliver the goals of the National Park Management Plan.</p>			

ASPIRATION	JUSTIFICATION	EA RESULTS	COMMENTARY
<p>a) Monitoring</p> <p>Inclusion in all licences and Integrated Management Plans of requirements for data and monitoring, together with arrangements for periodic review</p> <p>A joint data review to establish more robust and meaningful data, e.g. total numbers of troops daily on the ranges, days all ranges in common use, and nature of weekend dry training. Agreed arrangements for verification and periodic analysis.</p> <p>Information to be publicly available.</p>	<p>Robust data which is easy to interpret is important for the proper management of training activity and for ensuring that impacts on Dartmoor are kept to a minimum. More precise targets, and monitoring, would be helpful to ensure that land management objectives are being achieved</p>		<p>Lack of detail in the EA about arrangements for ongoing monitoring.</p>
<p>b) Liaison arrangements</p> <p>Definition in the principal Duchy licence of the liaison arrangements between DNPA Rangers, the Duchy Deputy Bailiff, and DE/Landmarc range staff, including arrangements and encouragement for routine liaison, joint training, and cooperative working</p>	<p>Effective liaison arrangements are critical to the successful accommodation of military training on Dartmoor in a way which meets defence training needs and is also consistent with National Park designation</p>	<p>Not covered in the EA</p>	<p>This aspiration is aimed more at the Duchy of Cornwall than the MoD.</p>

ASPIRATION	JUSTIFICATION	EA RESULTS	COMMENTARY
<p>c) Dartmoor Steering Group and Working Party</p> <p>To continue as a strong partnership with a periodic review of membership and working arrangements</p>	<p>The liaison arrangements established following the Sharp Inquiry in 1975 have immeasurably improved relationships over the years, and must continue for the future</p>	<p>Not covered in the EA.</p>	<p>Not covered in the EA.</p>
<p>d) Other Public Information</p> <p>Better communication of the positive contribution of military training to Dartmoor's environment and economy</p>	<p>The public could be better informed about military training and the positive benefits which accrue to the conversation of Dartmoor's environment and to the local economy, and the working relationships and partnerships that exist to achieve this</p>		<p>The EA indicates the importance of better public information and proposes such provision as part of additional mitigation measures.</p>