

GLENELG SEA FOREST SEAWEED FARMS: NOSTIE BANK & AIRD A MHILL, LOCH ALSH

APPENDIX 5: POLICIES CONSIDERED UNDER SCOTLAND'S NATIONAL MARINE PLAN

Nostie Bank, Appendix 5 – Scotland's National Marine Plan

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1 Introduction

This document considers Scotland's National Marine Plan 2015, and sets out the policies that have not been considered, along with those that have.

2 Policies Not Considered

The following policies have not been considered, as they either have no bearing on the actions of Glenelg Sea Forest Ltd (GSF) and relate to the actions of regulators and/or third parties; or relate to marine use where there is no interaction with the proposed development.

- Sea Fisheries (FISHERIES 1, 2 and 5)
- Aquaculture (AQUACULTURE 1, 2, 4, 7, 8, and 12)
- Recreation and Tourism (REC AND TOURISM 4 and 5)
- Oil and Gas (All Policies)
- Carbon Capture and Storage (CCS) (All Policies)
- Offshore Wind and Marine Renewable Energy (All Policies)
- Shipping, Ports, Harbours and Ferries (TRANSPORT 2-7)
- Submarine Cables (All Policies)
- Defence (Policies 2-3)
- Aggregates (All Polices)

3 Policies Considered

3.1 GENERAL POLICIES

GENERAL POLICIES		
NMP POLICY NUMBER	CONSIDERATION AND COMMENT	
GEN 1 General planning principle: There is a presumption in favour of sustainable development and use of the marine environment when consistent with the policies and objectives of this Plan.	This document demonstrates the consideration that has been given to the policies and objectives of the NMP in bringing forward the proposed development. The burgeoning seaweed farming industry in Scotland provides an exciting opportunity for a sustainable new food production system. GSF plan to use practical, non-invasive seaweed farms that integrate well with the local marine environment and can be scaled accordingly with site-specific requirements. This method of farming on ropes will provide a sustainable alternative to the dredging of wild seaweeds, which has come under pressure in recent years.	
GEN 2 & 3: GEN 2 Economic benefit: Sustainable development and use which provides economic benefit to Scottish communities is encouraged when consistent with the objectives and policies of this Plan.	Seaweed farming is an embryonic industry on the West Coast of Scotland, and development will allow it to provide further contribution to the economy, both locally and nationally. Furthermore, this area is heavily reliant on seasonal income during holiday periods, particularly in the summermonths. A seaweed farm in this area will provide alternative employment outside of these peakperiods, during seed deployment in Winter and harvest in Spring.	
GEN 3 Social benefit: Sustainable development and use which provides social benefits is encouraged when consistent with the objectives and policies of this Plan.	Historically, seaweed farming was a thriving industry in Scotland. By rejuvenating the industry in this area, GSF hope to encourage a sense of natural and historical well-being in both residents and visitors. GSF would like to allow visitors to our site, and in the future would consider providing educational tours regarding the history and future of seaweed farming as a Scottish industry.	
GEN 4 Co-existence: Proposals which enable coexistence with other development sectors and activities within the Scottish marine area are encouraged in planning and decision makingprocesses, when consistent with policies and objectives of this Plan.	In bringing forward proposals for this farm site GSF has sought, where possible, to adapt their requirements to the needs of other interests. Having spoken to local stakeholders, the applicant believes that this project does not impinge on other marine developments or activitiesin the area. GSF are also exploring the potential for Integrated Multi-trophic Aquaculture Systems (IMTAS) between the seaweed farming sector and other aquaculture sectors, especially fish and shellfish farms.	
GEN 5 Climate change: Marine planners and decision makersmust act in the way best calculated to mitigate, and adapt to,climate change.	Apart from short seeding and harvesting periods each year, there will be little vessel activity at the farm. There will be no carbon or greenhouse gas emissions from the seaweed farm. A small amount of carbon may be sequestered from each crop. No artificial chemicals or nutrients will be required during the growth period of the crop. There is some evidence that seaweed farms of this nature may also provide protection against coastal erosion.	

GEN 6 Historic environment: Development and use of themarine set out in the NMP. environment should protect and, where appropriate, enhance heritage assets in a manner proportionate to their significance. GEN 7 Landscape/seascape: Marine planners and decision makers should ensure that development and use of the marine environment seascape, landscape and visual impacts into account. GEN 8 Coastal process and flooding: Developments and activities in the marine environment should be resilient to coastal change and flooding, and not have unacceptable adverse impact on coastal processes or contribute to coastal Flooding

The proposed development will not impact on any marine heritage assets as

Consideration of the Landscape, Seascape and Visual Impact of the proposed development has been given consideration in site selection by the developer. Seaweed farms are inherently low visual impact - the seaweed long lines and grid structure will be very low profile, sitting approximately two meters below the surface and barely visible to the naked eye. The only visible aspects will be marker buoys designating the outer limits of the structure, which are required to comply with marine safety regulations. The site, discreetly tucked into the eastern shoreline of Loch Alsh, will not be visible from the key local tourism routes. The site itself is inaccessible by road.

It is considered that, as a floating structure, the proposed development is resilient to coastal change and flooding and furthermore we can foresee no negative impacts of the farm site on coastal process and flooding. It will not have an adverse impact on coastal processes and couldpotentially provide protection against coastal erosion.

GEN 9 Natural heritage: Development and use of the marine environment must:

- (a) Comply with legal requirements for protected areas and protected species.
- (b) Not result in significant impact on the national status of Priority Marine Features.
- (c) Protect and, where appropriate, enhance thehealth of the marine area.

In bringing forward the proposed development consideration has been given to the presence, in the wider area of protected species, and the location of the development within Lochs Duich, Long and Alsh MPA which was designated for the protection of flame shells and burrowed mud.

- (a) The farm site lies within the Inner Hebrides and the Minches SAC which is designated for protection of Harbour Porpoises and the Lochs Duich, Long and Alsh Reefs SAC, which is designated for the protection of extensive areas of tide-swept reefs, extremely sheltered rocky reefs and horse mussel beds. We will work closely with Scottish Natural Heritage (SNH) to ensure that we comply with all legislation set out to protect these and other species. On comparing surveillance charts provided by NatureScot there are no visible conflicts between these protected features and the intended location for our site.
- (b) Pile anchors or suction moorings will be used to limit the interaction with the seabed. The mooring design will be finalised following a seabed survey, once the licence is achieved.
- (c) Seaweed grows without the need for chemical fertilizer or artificial nutrient. It is known to absorb waste from both terrestrial activity and other forms of aquaculture, which may be beneficial for the surrounding water quality.

GEN 10 Invasive non-native species: Opportunities to reduce the introduction of invasive non-native species to a minimum or proactively improve the practice of existing activity should be taken when decisions are being made.	The farm structure and site related equipment are to be assembled locally reducing the opportunity for INNS to be transferred onto the site from further afield. A strict biosecurity planwill be followed by employees and marine vessels working on the farm site. Fertile material for seeding will be collected from native seaweed populations found on the seabed, rocky foreshores and harbours close to the farm site. Seed culture will be developed at a secure hatchery unit and transported by vessel to the farm site. Following harvest, the seaweed crop may be processed in a local facility close by.
GEN 11 Marine litter: Developers, users and those accessingthe marine environment must take measures to address marine litter where appropriate. Reduction of litter must be taken into account by decision makers.	The Applicant fully supports the principles of waste minimisation and management. Within the developer's policies in relation to Marine Litter, zero tolerance of overboard waste and shoreline litter collection. Growing seaweed is an extractive form of aquaculture. Any waste generated by the farm site will be disposed of on land through commercially approved waste disposal services.
GEN 12 Water quality and resource: Developments andactivities should not result in a deterioration of the quality of waters to which the Water Framework Directive, Marine Strategy Framework Directive or other related Directives apply.	Water Quality will not be adversely impacted by the proposed development. Seaweed does not require fresh water or produce water waste during cultivation. It may be beneficial to surrounding seawater, absorbing waste products from terrestrial agricultural activities and nearby aquaculture sites.
GEN 13 Noise: Development and use in the marine environment should avoid significant adverse effects ofman- made noise and vibration, especially on species sensitive to such effects.	In bringing forward the proposals the developer has considered the potential impact of noise fromthe site on human receptors on the shore. There will be no noise pollution from the farm site in this regard. The impact of underwater noise from boat movements and echosounders has also been considered by the developer and deemed to make no material variation to noise generatedby existing used of Loch Alsh.
GEN 14 Air quality: Development and use of the marineenvironment should not result in the deterioration of air quality and should not breach any statutory air quality limits.	It is not considered that there will be any impact on air quality resulting from the proposed development.
GEN 15 Planning alignment A: Marine and terrestrial plans should align to support marine and land-based components required by development and seek to facilitate appropriate access to the shore and sea.	Terrestrial elements of the project will be undertaken using existing infrastructure at nearby access points, which requires no further planning. Vessels will access the farm using a choice ofexisting private and public slipways in Loch Alsh. Permission to use private slipways has been provided by the landowners. The applicant will work positively alongside other planning, regulation and management that affects the use of the marine
GEN 16 Planning alignment B: Marine plans should align and comply where possible with other statutory plans and shouldconsider objectives and policies of relevant non-statutory plans where appropriate to do so.	area.

GEN 17 Fairness: All marine interests will be treated withfairness and in a transparent manner when decisions are being made in the marine environment.	GSF agree wholeheartedly with the spirit of fairness, and the importance of developing a sustainable industry that will prove beneficial socially and economically for generations to come. They are collaboratively working with local stakeholders to ensure that these aims are met.
GEN 18 Engagement: Early and effective engagement should be undertaken with the general public and all interested stakeholders to facilitate planning and consenting processes.	GSF has a demonstrable track record of engaging with local stakeholders and members of the local community in Loch Alsh throughout the project thus far, as well as the relevant marine bodies.
	The applicant undertook informal consultation with stakeholders and several publicregulatory authorities during its initial site selection process, and during meetings with Crown Estate Scotland prior to seeking a Lease Option.
	Pre-application events were undertaken in Mar-2021, and again in Dec-2021 – refer to Appendices 6 and 6a.
	In addition, other representative organisations were informed of the preapp process, invited to attend the online PAC event and to comment and/or provide information as appropriate. These organisations included, but are not limited to, Fishermens Organisation, Royal Yachting Association (Scotland), Scottish Natural Heritage, Northern Lighthouse Board. Full details of the pre-application process undertaken are submitted in support of this Licence application.
GEN 19 Sound evidence: Decision making in the marine environment will be based on sound scientific and socioeconomic evidence.	Modern seaweed farming is an emergent industry and as such there is much to learn. The applicant has sought scientific and socio-economic advice from individuals and marine bodies from SAMS; and have spent time evaluating seaweed farms in Northern Europe, where the industry is roughly five years ahead of our own. The applicant will continue to seek advice regarding all aspects of the project.
GEN 20 Adaptive management: Adaptive management practices should take account of new data and information in decision making, informing future decisions and future iterations of policy	With strong and decisive management practices, GSF will closely monitor new development in the aquaculture industry and use this knowledge to inform decision making throughout the project
GEN 21 Cumulative impacts: Cumulative impacts affecting the ecosystem of the marine plan area should be addressed in decision making and plan implementation.	Third party evidence of existing seaweed farms in Argyll and Lochaber providing excellent nursery grounds for lumpfish were previously provided to GSF; showing how it can enhance the surrounding ecosystem. Therefore, GSF foresee no negative cumulative impacts of the seaweed farm on the surrounding ecosystem.

3.2 SEA FISHERIES

SEA FISHERIES

NMP POLICY

FISHERIES 3: Where existing fishing opportunities or activity cannot be safeguarded, a Fisheries Management and Mitigation Strategy should be prepared by the proposer of development or use, involving full engagement with local fishing interests (and other interests as appropriate) in the development of the Strategy. All efforts should be made to agree the Strategy with those interests. Those interests should also undertake to engage with the proposer and provide transparent and accurate information and data to help complete the Strategy. The Strategy should be drawn up as part of the discharge of conditions of permissions granted. The content of the Strategy should be relevant to the particular

• An assessment of the potential impact of the developmentor use on the affected fishery or fisheries, both in socio- economic terms and in terms of environmental sustainability.

circumstances and could include:

- A recognition that the disruption to existing fishing opportunities/activity should be minimised as far as possible.
- Reasonable measures to mitigate any constraints which the proposed development or use may place on existing or proposed fishing activity.
- Reasonable measures to mitigate any potential impacts onsustainability of fish stocks (e.g. impacts on spawning groundsor areas of fish or shellfish abundance) and any socioeconomic impacts. Where it does not prove possible toagree the Strategy with all interests, the reasons for any divergence of views between the parties should be fullyexplained in the Strategy and dissenting views should be given a platform within the Strategy to make their case.

CONSIDERATION AND COMMENT

- Impact on Commercial Fishing was considered during the preparation of the license application. Fishermen's organisations and local mobile gear fishermen were invited to comment on proposals during informal pre-application consultations in early 2021. The information provided at the early stage consultations was one factor taken into consideration in finalising site location. Indeed the planned location was changed specifically to accommodate existing fishing interests. The site area applied for in this licence application is contained within the Crown Estate Lease Area and incorporates shorter/ steeper mooring chains on the shoreward side of the proposed development in order to minimise impact on mobile gear fishermen.
- As part of the assessment of other marine activities taking place on the site coverage of the area has been informally reviewed. Within this data, incidence of commercial fishing activity within the selected site area is very low.
- It is not considered that the proposed development will have any significant adverse impact on the area of fishing grounds available to the commercial fishing activities. The proposed development may, however, offer additional employment opportunities for qualified skippers and crews. Potential future development of facilities in the Loch Alsh area may provide additional access opportunities for other marine users in the area.

FISHERIES 4: Ports and harbours should seek to engage with fishing and other relevant stakeholders at an early stage todiscuss any changes in infrastructure that may affect them. Any port or harbour developments should take account of the needs of the dependent fishing fleets with a view to avoiding commercial harm where possible. Where a port or harbour has reached a minimum level of infrastructure required to support a viable fishing fleet, there should be a presumptionin favour of maintaining this infrastructure, provided there is an ongoing requirement for it to remain in place and that it continues to be fit for purpose.

This policy is directed at the operators of ports and harbours. Whilst GSF has not considered thispolicy in bringing forward proposals it is noted that the mid to long term intention development of sustainable seaweed farming in Loch Alsh and surrounding areas could result in additional facilities being available in the Loch Alsh area which would benefit commercial fishing interests of proposed.

3.3 AQUACULTURE

AQUACULTURE NMP POLICY CONSIDERATION AND COMMENT AQUACULTURE 3: In relation to nutrient While this policy is directed at operators of fin fish farms; GSF note that enhancement and benthic impacts, as set the proposed development for the cultivation of seaweed has no out under Locational Guidelines for the requirement for feed or fertilizer inputs and is an extractive type of Authorisation of Marine Fish Farms in aquaculture. There is a growing body of evidence to support the Scottish Waters, fish farm development is proposition that farming seaweed at a sustainable scale such as this likely to be acceptable in Category 3 proposal will deliver ecological and benthic improvement to a body of areas, subject to other criteria being water. satisfied. A degree of precaution should be applied to consideration of further fish farming development in Category 2 areas and there will be a presumption against further fish farm development in Category 1 areas. **AQUACULTURE 5: Aquaculture** This Policy duplicates policy GEN 7. developments should avoidand/or Consideration of the Landscape, Seascape and Visual Impact of the mitigate adverse impacts upon the proposed development has been given consideration in site selection by seascape, landscape and visual the developer. Seaweed farms are inherently low visual impact - the amenity of an area, following SNH guidance75 on the siting and design of seaweed grid structure will be very low profile, sitting approximately two aquaculture. meters below the surface and barely visible to the naked eye. The only visible aspects will be marker buoys designating the outer limits of the structure, which are required to comply with marine safety regulations. The site, discreetly tucked into the eastern shoreline of Loch Alsh, willbe hidden from the local tourism routes of. The site itself is inaccessible by road.

AQUACULTURE 6: New aquaculture sites should not bridge Disease Management Areas although boundaries may be revised by Marine Scotland to take account of any changes in fish farm location, subject to the continued management of risk.

While this policy is directed at operators of fin fish farms. GSF note that the concept of Disease Management Areas is aligned with the biosecurity principles adhered to by GSF. Seaweed farming in Scotland is not at a scale or density that would make this a relevant issue. The applicant is focused on cultivating only native Scottish species.

AQUACULTURE 10: Operators should carry out pre- application discussion and consultation, and engage withlocal communities and others who may be affected, to identify and, where possible, address any concerns in advance of submitting an application.

This policy duplicates policy GEN 18

The applicant has a demonstrable track record of engaging with local stakeholders and members of the local community in Loch Alsh throughout the project thus far, as well as the relevant marinebodies. The applicant undertook informal consultation with stakeholders and several public regulatory authorities during its initial site selection process, and during 2021 meetings with the Crown Estate prior to seeking a Lease Option.

Pre-application events were undertaken in Mar-2021, and again in Dec-2021 – refer to Appendices 6 and 6a.

In addition other representative organisations were informed of the pre-app process, invited to attend the online PAC event and to comment and/or provide information as appropriate. These organisations included, but are not limited to, Fishermens Organisation, Royal Yachting Association (Scotland), Nature Scot, Northern Lighthouse Board. Full details of the pre- application process undertaken are submitted in support of this Licence application.

AQUACULTURE 11: Aquaculture equipment, including but not limited to installations, facilities, moorings, pens and nets must be fit for purpose for the site conditions, subject to future climate change. Any statutory technical standard must be adhered to. Equipment and activities should be optimised in order to reduce greenhouse gas emissions.

While this policy is directed at operators of fin fish farms, GSF is focused on using the most environmentally sensitive options available for all materials and equipment.

It is noted that equipment will be specified and supplied in accordance with the Scottish Technical Standard and it will be certified as fit for purpose by the supplier/manufacturer. Although excessive for the needs of seaweed farming, this fin fish standard is referenced for guidance on best practice as there is not yet a relevant standard for seaweed farming.

AQUACULTURE 13: Proposals that contribute to the diversification of farmed species will be supported, subjectto other objectives and policies being satisfied.

While this policy is directed at operators of fin fish farms; GSF is focused on developing a best practice model of seaweed farming which will lead the development of a sustainable seaweed industry in Scotland. The applicant recognises that there are sufficient challenges in seaweed farming to warrant undivided attention on one type of cultivation. Notwithstanding, this desire to establish a new farming industry for Scotland, the applicant is supportive and will facilitate suitable opportunities for diversification if and when they arise.

AQUACULTURE 14: The Scottish Government, aquaculture companies and Local Authorities should work together to maximise benefit to communities from aquaculture development. This policy duplicates the provisions of policies GEN 2 and 3.

The proposed development is part of an ambitious project which seeks to develop several sites in the Loch Alsh area. The long term aim is that local Social and Economic Benefit will be realised through increased employment opportunities for the wider Highland area as well as direct income to community members in the Loch Alsh area.

3.4 WILD SALMON AND DIADROMOUS FISH

WILD SALMON AND DIADROMOUS FI	VILD SALMON AND DIADROMOUS FISH		
NMP POLICY	CONSIDERATION AND COMMENT		
WILD FISH 1: The impact of development and use of the marine environment on diadromous fish species should be considered in marine planning and decision making processes. Where evidence of impacts on salmon and other diadromous species is inconclusive, mitigation should be adopted where possible and information on impacts on diadromous species from monitoring of developments should be used to inform subsequent marine decision making.	While this policy is directed at operators of fin fish farms; it is noted that there is a growing body of evidence to suggest that the ecological enhancement generated by cultivation of seaweed in Scotland's coastal environs will potentially have positive impacts on wild salmonids in the surrounding environment and nearby rivers.		

3.5 RECREATION AND TOURISM

RECREATION AND TOURISM	CREATION AND TOURISM		
NMP POLICY	CONSIDERATION AND COMMENT		
REC & TOURISM 1: Opportunities to promote sustainable development of marine recreation and tourism should be supported.	Analysis of vessel traffic in the vicinity indicates limited use of the site area for boatbased marine tourism. Opportunities for tourism of this nature may be improved through the proposed development which will provide an excellent educational opportunity on the many benefits if farming seaweed.		

with.

REC & TOURISM 2: The following key The extent of the development is small scale and therefore unlikely to factors should be takeninto account when have any impact on various recreation and tourism activities including but deciding on uses of the marine not limited to sailing, Cruise boats, sub-aqua, sea kayaking, sea angling, environment and the potential impact on travel by car and coach and coastal walking. recreation and tourism: • The extent to which the proposal is likely to adversely affect he qualities important to recreational users, including the extent to which proposals may interfere with the physical infrastructure that underpins a recreational activity. • The extent to which any proposal interferes with access to and along the shore, to the water, use of the resource for recreation or tourism purposes and existing navigational routes navigational safety. • Where significant impacts are likely, whether reasonable alternatives can be identified for the proposed activity or development. Where significant impacts are likely there are no reasonable alternatives, whether mitigation, through recognised and effective measures, can be achieved at no significant cost to the marine recreation or tourism sector interests. REC & TOURISM 3: Regional marine plans Whilst it is noted that the Loch Alsh area is an important destination for should identify areas that are of recreation and tourism, the site location chosen avoids major, significant recreational and tourism value and impacts on terrestrial viewpoints. identify where prospects for significant development exist, including opportunities to link to the National Long DistanceWalking and Cycle Routes, and more localised and/or bespoke recreational opportunities and visitor attractions. REC & TOURISM 6: Codes of practice for Whilst this policy is directed at Recreation and Tourism Operators, GSF invasive non-nativespecies and Marine intends to undertake staff training to ensure that boat movements are Wildlife Watching should be complied

operations on wildlife.

compatible with the provisions of Marine Wildlife Watching Codes of

Practice to seek to mitigate the impacts of the development and on-site

3.6 SHIPPING, PORTS, HARBOURS AND FERRIES

the shipping or ports sector.

SHIPPING, PORTS, HARBOURS AND FERRIES **CONSIDERATION AND COMMENT NMP POLICY** TRANSPORT 1: Navigational safety in relevant areas used by Early communication with the Northern shipping now and in the future will be protected, adhering to Lighthouse Board ascertained that it did not the rights of innocent passage and freedom of navigation have any significant concerns over navigational contained in UN Convention on the Law of the Sea (UNCLOS). impacts subject to the site being appropriately The following factors will be taken into account when reaching marked. decisions regarding development and use: Recent communication with the Maritime & • The extent to which the locational decision interferes with Coastguard Agency (MCA) requires that a existing or planned routes used by shipping, access to ports Navigation Risk Assessment is undertaken. This and harbours and navigational safety. This includes is currently being prepared and will be commercial anchorages and defined approaches to ports. submitted as Appendix 7. • Where interference is likely, whether reasonable No vessels involved in commercial shipping alternatives can be identified. currently travel close to the proposed site area. • Where there are no reasonable alternatives, whether The proposed development is distant from any mitigation through measures adopted in accordance with the ferry routes. principles and procedures established by the International Maritime Organization can be achieved at no significant cost to There is traffic related to fish farming operations

elsewhere in Loch Alsh and GSF does not consider that there will be any difficulty in making vessel operators aware of on-site

There are no large vessel operations required at any stage during the installation or operation of

activities at Aird A Mhill or Nostie.

the site.

3.7 DEFENCE

DEFENCE 1: To maintain operational effectiveness in Scottish waters used by the armed services, development and use will be managed in these areas:

- Naval areas including bases and ports: Safety of navigation and access to naval bases and ports will be maintained. The extent to which a development or use interferes with access or safety of navigation, and whether reasonable alternatives can be identified, will be taken into account by consenting bodies. Proposals for development and use should be discussed with the MOD at an early stage in the process.
- Firing Danger Areas: Development of new permanent infrastructure is unlikely to be compatible with the use of Firing Danger Areas by the MOD. Permitted activities may have temporal restrictions imposed. Proposals for development and use should be discussed with the MOD at an early stage in the process.
- •Within Exercise Areas, activities may be subject totemporal restrictions. Development and use that either individually or cumulatively obstructs or otherwise prevents the defence activities supported by an exercise area may not be permitted. Proposals for development and use should bediscussed with the MOD at an early stage in the process.
- Communications: Navigations and surveillance including radar: Development and use which causes unacceptable interference with radar and other systems necessary for national defence may be prohibited if mitigation cannot be determined. Proposals for development and use should be discussed with the MOD at an early stage in the process.

The applicant has considered this policy in bringing forward proposals and does not consider that location of the development will impact in any way on the operational effectiveness of HM Armed Services.