

Devon and Severn IFCA response to MMO consultation for Watchet Harbour - Eastern Pier Wall Permanent Repairs, MLA/2020/00266.

Submitted using the comments box on MCMS

Devon and Severn Inshore Fisheries and Conservation Authority (D&S IFCA) is the statutory manager of sea fisheries from baselines out to six nautical miles in English waters within the Authority's District. This includes the English waters of the Severn Estuary SAC. The powers and duties of the D&S IFCA are provided by the Marine and Coastal Access Act (2009). The ten regional IFCAs have a shared vision:

“Inshore Fisheries and Conservation Authorities will lead, champion and manage a sustainable marine environment and inshore fisheries, by successfully securing the right balance between social, environmental and economic benefits to ensure healthy seas, sustainable fisheries and a viable industry.”

The D&S IFCA's responses to MLA consultations typically focus on sea fish rather than migratory fish (salmon, sea trout, river and sea lamprey, twaite and allis shad and European eel). The Environment Agency is responsible for the management of migratory fish and fisheries relating to these species. With regards to this application and consultation, the Devon and Severn IFCA's fisheries expertise relates to the English waters of the Severn Estuary.

Devon and Severn IFCA has only minor comments and recommendations for conditions to be attached to the Marine Licence, if granted. The South West Inshore Marine Plan appears to have been adequately considered by the applicants, who rightly identify the benefits to tourism, recreation and the local economy that are likely to result from the proposed activity. The activities in the MLA are proposed to take place in the footprint of the original structure, which is likely to minimise risks to the marine environment, including the foreshore. The proposed method for placing plant on the foreshore appears to be practical and to take account of potential damage to the foreshore, though a thorough examination of the method statement should be undertaken before activities commence. Movement of plant once placed on the foreshore should be limited as much as possible. Intertidal *Sabellaria* reef is known to exist in the local area, though D&S IFCA are not currently aware of its presence on the areas of foreshore that will be subject to the placement of plant machinery. *Sabellaria* is a designated feature of the nearby Severn Estuary SAC, and likely forms habitat for fish species that comprise the fish assemblage sub-feature of the SAC, including those that may move between the SAC and non-designated waters such as those around Watchet. It would, therefore, be prudent to avoid the placement of plant in the vicinity of *Sabellaria*, if it is identified as being present on the foreshore.

In order to ensure that no material enters the marine environment and becomes a potential hazard to marine life and designated sites, it would be advisable that the applicants and their contractors adhere to the Pollution Prevention Guidelines when working near or within the marine environment. These best practice guidelines were produced by the Environment Agency and are now archived, but are still widely used by developers. To further minimise the risk of waste entering the marine environment, it may be requested that wastes from licenced activities may be stored in designated areas that are bunded and isolated from surface water drains and the sea bed, which is exposed at low tide. Further, any oil, fuel or chemical spill within the marine environment should be reported to the MMO Marine Pollution Response Team as soon as is reasonably practicable (and within 12 hours).

D&S IFCA seeks to balance the needs of users of the marine environment. In that context, mariners and fishermen's organisations, including neighbouring port authorities and other local stakeholders, should be made fully aware of the activities through a local notice to mariners.