Date: 13 May 2022
Our ref: 368447
Your ref: SBS-MCZ-006 Towed demersal gear 2021v.2

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BY EMAIL ONLY

Dear Sarah,

RE: Marine Conservation Zone: Skerries Bank and Surrounds MCZ UKMO 20130019

Thank you for your letter received 09 March 2022.

Together with our initial response to your assessment for the site from 20 September 2021 (sent to you 19 October 2021) this letter completes our formal advice on your assessment of the impacts of demersal gear on this site.

We recognise that initial stakeholder support for the Skerries Bank and Surrounds MCZ designation was on the basis that there would be no changes in site management as a result of the designation. However, Natural England's role in this assessment process is to formally advise on assessments as laid out in Section 127 of the Marine and Coastal Access Act. This formal advice is limited to: matters that are capable of damaging or otherwise affecting any protected feature, or ecological/ geomorphological process on which the conservation of any such feature is dependent; and how any conservation objectives for a site can be furthered, or how the achievement of those conservation objectives might be hindered. Therefore, while we recognise the validity of the arguments presented around site history and socio-economic importance, we cannot take them into account in our consideration of, and advice on, the ecological impacts that the activity may be having on the feature(s): this is the basis on which our formal advice has been provided.

NE note that the IFCA have made a decision for the moderate energy circalittoral rock feature due to low confidence in the feature's occurrence in the areas open to demersal gear, based on ground truthing evidence collected in those areas that does not show presence of rock. The quality of the updated habitat map for the site as a whole, based on the verification survey, is 'high' (75-80, MESH Confidence Assessment Tool), but we acknowledge that this map does show a scattered and relatively minimal distribution of moderate energy circalittoral rock throughout the site. It is possible that this habitat map is underestimating the distribution of rock, particularly within deeper water areas. NE would welcome the opportunity to work together in the future to better understand the extent of this feature within the site to inform future assessment reviews, given the highly sensitive nature of that feature and the need for management where it does exist.

Whether or not the current trawling and dredging activities are occurring over the moderate energy circalittoral rock feature, significant impacts from these activities are not limited to the rock features of the site alone. The evidence supports a conclusion that operation of trawls and dredges within the access areas would also adversely impact the sublittoral sediment features: in particular, the subtidal coarse sediment which makes up a considerable proportion of the site according to the updated habitat map.

D&S IFCA has concluded through the evidence gathered and literature reviewed that attributes and targets for the subtidal coarse sediment and subtidal sand, which are to be maintain in favourable condition, can be met by the management measures that are currently in place. The evidence presented in the assessment acknowledges that areas that are intensively fished are likely to be maintained in a permanently altered state, and that if a pressure occurs too frequently for a habitat to recover, then the biomass and productivity of that benthic community declines, and sustainability may be jeopardised. Our conclusion from consideration of the evidence provided is that while there is some evidence of recovery of some habitats and species associated with the subtidal sediment features of the site during the closed seasons in the various zones open to demersal gear, the literature suggests that the recovery times for the key biotopes associated with the designated features would extend beyond the 5 or 11 month closure periods annually experienced. Whilst it is noted that the site was designated with a maintain GMA for subtidal coarse sediments, this GMA refers to a direction of travel needed to achieve favourable ecological condition (and ultimately achieve conservation objectives) and was based on a vulnerability assessment at the time of designation. With improved understanding of the site and further evidence regarding timescales for biotope recovery, as well as the semi-altered state of communities present, NE does not agree that the current management is maintaining favourable condition of the feature.

On consideration therefore, NE cannot agree with the overall conclusion that the current protection of the site allows for the conservation objectives of the site to be met.

Yours sincerely,

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