# Consultation on marine Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) in English, Welsh and offshore waters around the UK.

Prawle Point to Plymouth Sound and Eddystone

*Scientific Case*

General

Question 1: Do you accept the scientific basis for this site?

No. Not entirely.

The draft SAC (dSAC) in the Prawle Point to Plymouth Sound area represents a blanket coverage of the selected area and includes habitats that do not qualify under the selection criteria.

Question 2: Do you have scientific information not already referenced in the SAC selection Assessment Document?

Yes.

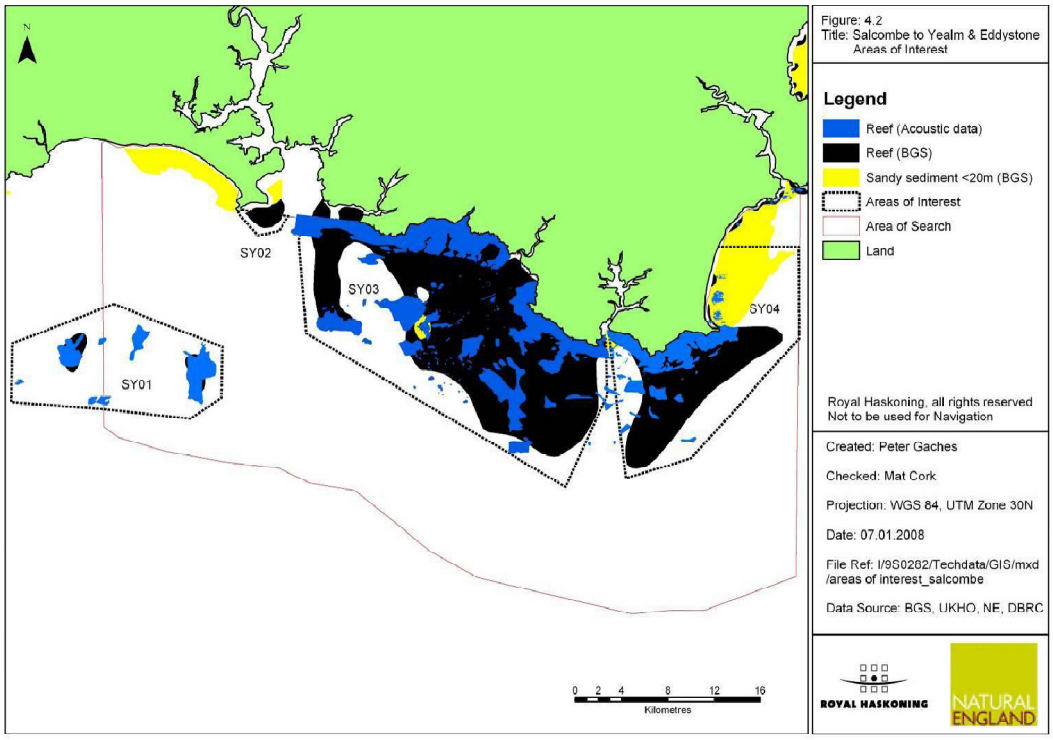


Figure 1 - Chart of the Habitat type

The area covered by the Site Assessment is shown in fig 1. The draft SAC in the Prawle Point to Plymouth Sound area is site reference SY03. Royal Haskoning undertook investigations in this area and as quoted from the assessment 'revealed that the reef features are not as

extensive as originally expected, and that there is great difference between the BGS data and the actual ground conditions in terms of reef habitat presence. This has highlighted the dangers in the reliance of using BGS data alone for classifying habitat extents. Whilst the BGS information does provide a useful guide, it needs to be supported with more detailed data.' In particular within SY03 approximately 60% of the area proposed does not qualify, which has also been confirmed verbally by Natural England, and the boundary of the draft SAC needs to be redrawn in this area.

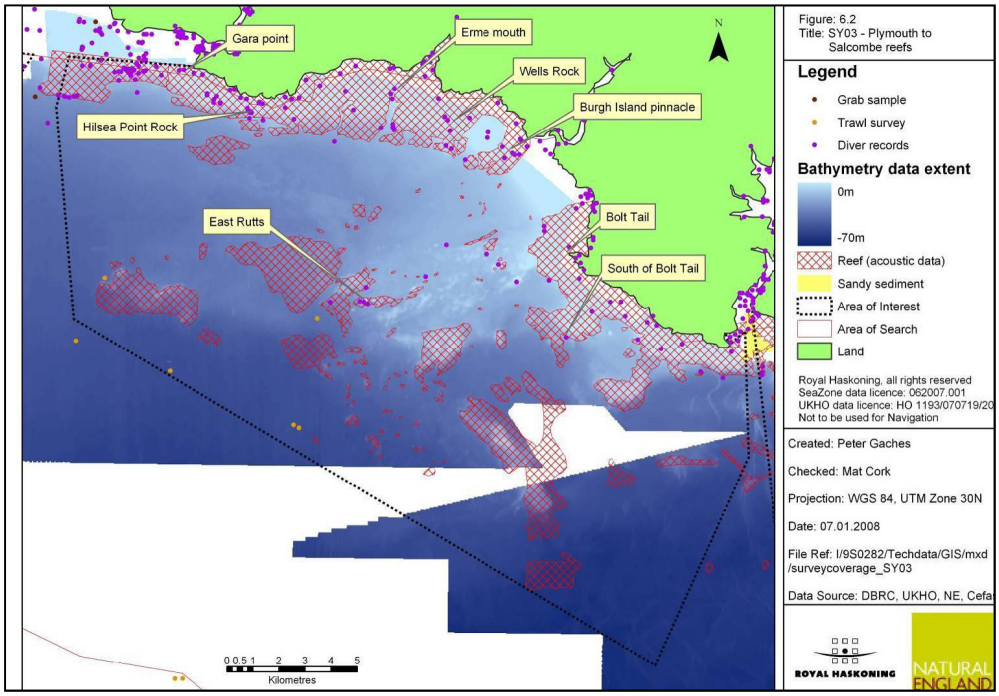


Figure 2 Royal Haskoning data collected for SY03

Figure 2 shows the acoustic data available for reef habitat gathered by Royal Haskoning. It is evident from this chart that there is a large area of seabed where reefs are not present in the Bigbury Bay area south of Hillsea Point Rock extending towards the coast at Bolt Tail and Bantham. This area of sea bed is known to be mostly sand, gravel and shingle and has been trawled by fishermen for many years. Haskoning carried out further video drop down surveys and confirmed this (see fig 3).

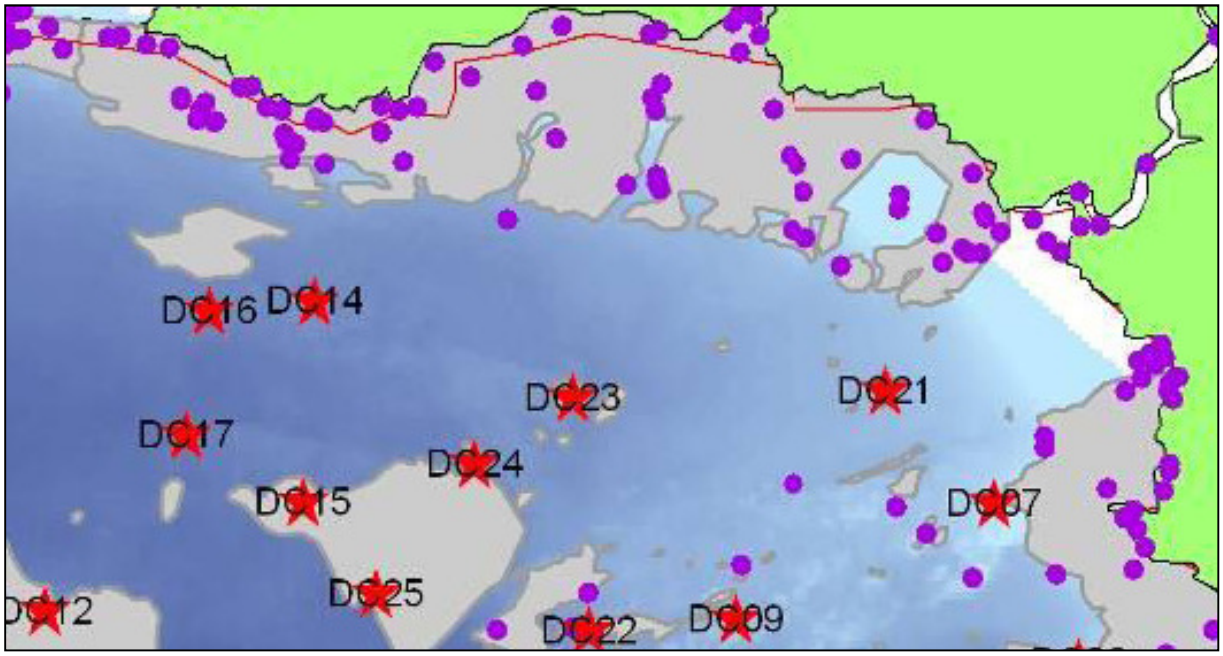


Figure 3 –Drop Camera Locations SY03

Fig 3 shows an enlarged chart of the area in question with the camera drop locations. The data collected from the locations DC14, DC16, DC17, and DC21 does not show reef habitat-: DC14 is mixed ground of coarse sand and broken shell and cobbles; DC16 indicated no reef present; DC17 showed the ground to be coarse shell gravel with cobbles and shell and silty with sparse life; DC21 was seen to have coarse sand with bits of shell. DC23 is the only site in this strip that had low rock outcrops and abundant pink sea fans present. It is suggested that the boundary be redrawn in this area to take into account that a majority of the habitat present is not reef and therefore does not qualify for inclusion in the draft SAC. It can be seen that from drop camera point DC23 that even though trawling has taken place in this area it has not damaged the sea fans at this location. Under section 7.1.3 of the Natural England's draft Conservation Objectives and Advice on Operations, the Hotspots Report (Hiscock & Breckels 2007) noted that records of actual damage to pink sea fans by mobile gear fishing are 'few' and that, throughout the site, the structure has 'not been notably affected by these activities.'

Fig 4 shows the dSAC boundaries and displays the reef habitats as defined by acoustic data. The boundaries drawn have extended out excessively from the features identified which are unnecessary and outside the guidelines drawn up (JNCC, 2008) to facilitate drawing of adequate boundaries than provide the essential level of protection. The JNCC guidelines suggest that at the chart depth of an average of 60m the lines drawn around the features should be 180m extending out from the habitat area of interest.

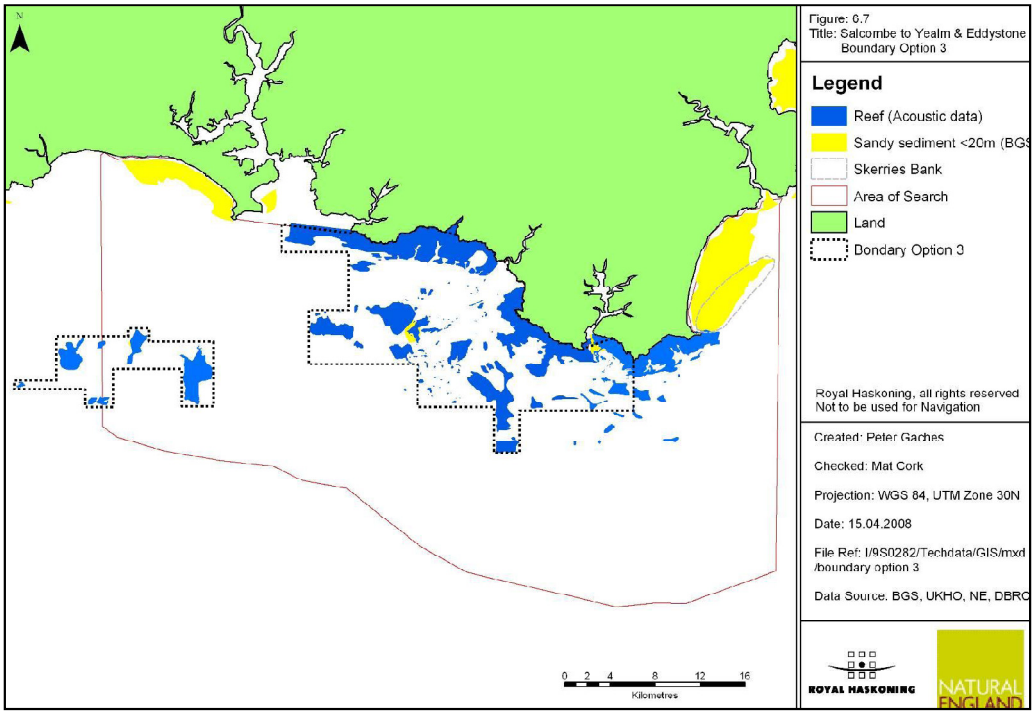


Figure 4 Boundary for Prawle Point to Plymouth Sound and Eddystone dSAC

Fig 5 shows the redrawn boundary line (in red) for the Prawle Point to Plymouth Sound SAC drawn up by Devon SFC which encompasses the changes mentioned within this response (the original dSAC boundary is in black). This redrawn boundary excludes the area known to have sediment types of coarse sand, sand and broken shell from Natural England's draft SAC and allows mobile fishing gear to continue to operate in this area. Many of the fishing vessels operating off the South Devon coast have Satellite Navigation Systems fitted which are accurate to within a few metres either side of the vessel, allowing the vessel to avoid obstacles on the seabed. By adjusting this boundary the reef features are protected and fishing activity may continue.

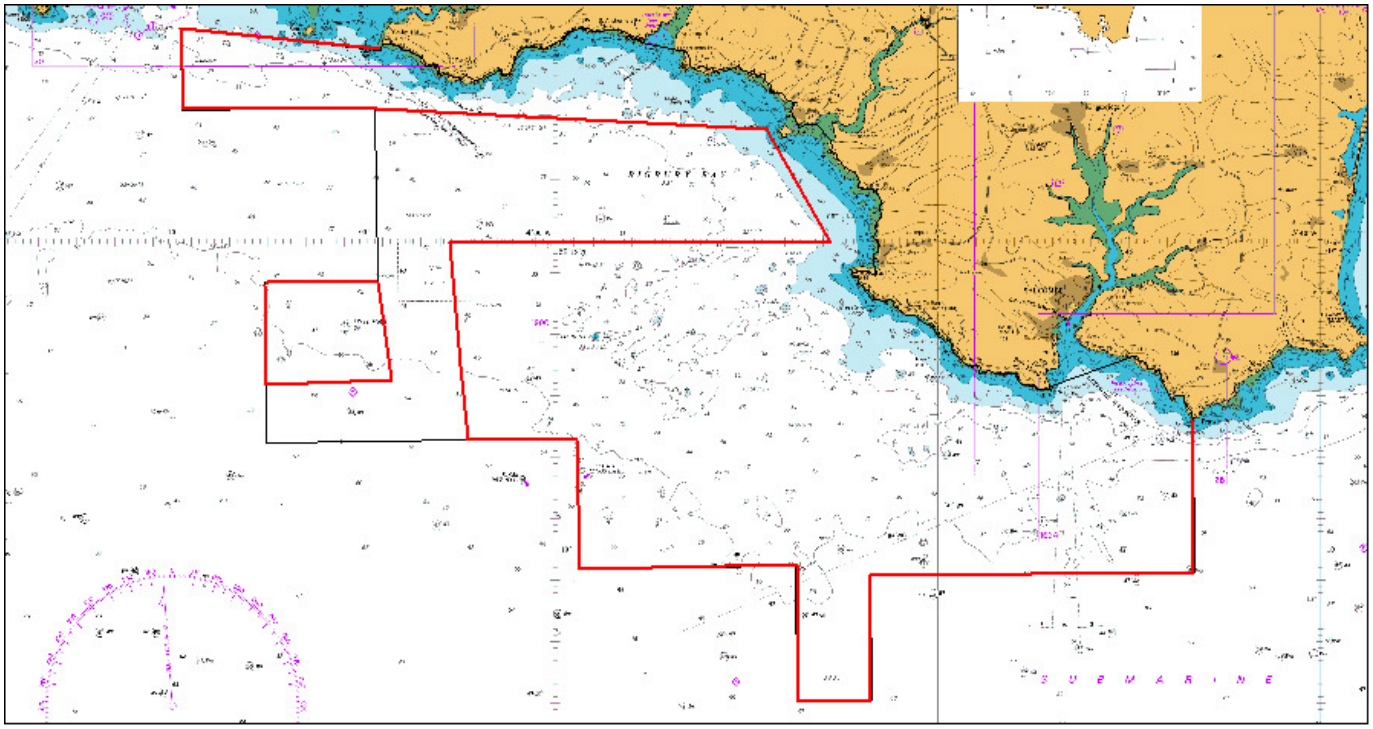

Figure 5 Redrawn boundaries for Prawle Point to Plymouth proposed SAC (shown in red)

The Eddystone Rocks lie within Cornwall Sea Fisheries Committee district but Devon SFC has a working knowledge of this area. The proposed SAC shows an irregular drawn boundary which encompasses large areas of non reef. It is suggested that the lines drawn around the reef features are divided into separate boxes which will protect those features but will allow fishing activity to take place in the areas of sand, coarse sand and dead shell that exists between the reefs. Alternative boundaries could be more fluid lines that follow the lines of the rock pinnacles that includes all reef features with a 200m buffer area (3x depth) but avoids drawing larger boundaries that included non-feature habitats. Fig 6 shows both these alternative dSAC boundaries. Enforcement of these areas can be carried out no matter what shape the boundary is.

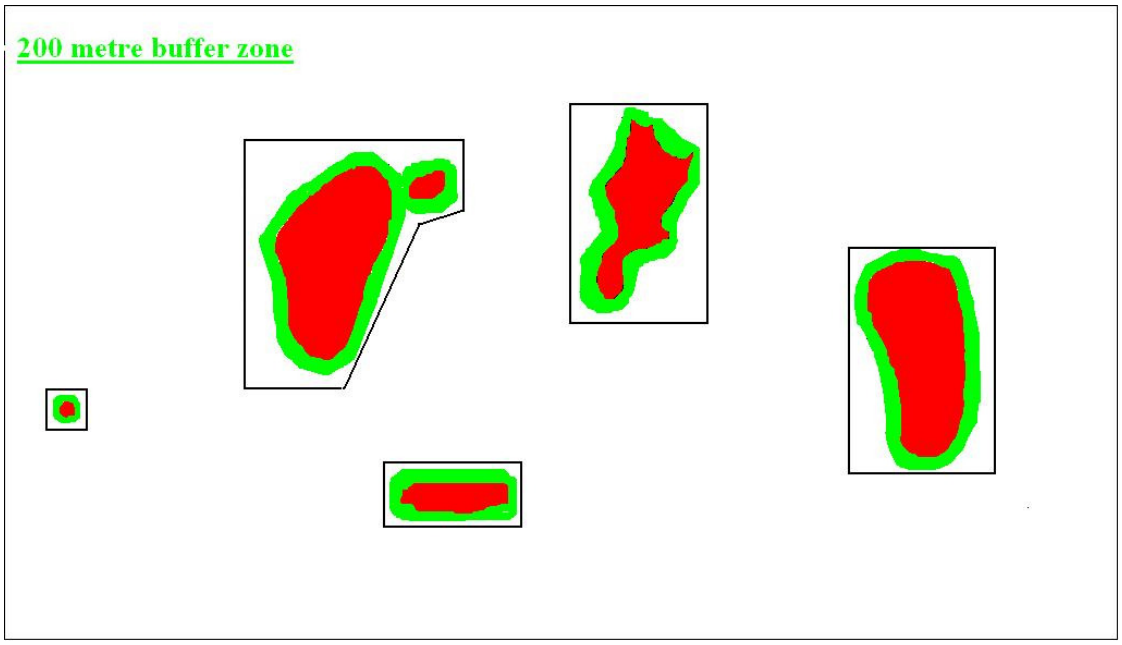


Figure 6 Alternative proposed SAC boundaries for the Eddystone Rocks

Question 3: Do you have any information additional to that included in the SAC Selection Assessment about the condition of Annex 1 habitats within the site boundary that you would like to share?

Yes. These have been included under S2 where appropriate.

Question 4: Do you have any further comments on the scientific selection of this site

Yes. These have been included under S2 where appropriate.

**References**

Hiscock. K., Breckels, M. (2007). Marine Biodiversity Hotspots in the UK. A report identifying and protecting areas for marine biodiversity. WWF 2007.

JNCC. 2008. UK guidance on defining boundaries for marine SACs for Annex 1 Habitat sites fully detached from the coast.

Natural England (2009). Inshore Special Are of Conservation: Prawle Point to Plymouth Sound & Eddystone. Draft Conservation Objectives and Advice on Operations. Version. 1.0 11th June 2009

Royal Haskoning (2008). Site Selection Report for the Inshore Marine SACs Project Salcombe to Yealm & Eddystone Final Report No.9S0282 to Natural England,

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## Prawle Point to Plymouth Sound and Eddystone

*Economic & Social Impacts*

Industry Specific Question 2

The facts and figures to be used for this section of the reply come from data held by the Devon Sea Fisheries Committee and cover the fishing industry based within the county of Devon. The data has been compiled by the Devon SFC as part of the work of officers on the ground. Some data on landings have been obtained from the Marine & Fisheries Agency from logbook declarations, all of which is publicly available data.

Section 4 – Costs & benefits of Option 1: Designate the site This section shows large discrepancies in the figures used for the value of the fishery landings and the figures that the Devon SFC holds.

The Devon SFC byelaw 18 prohibits fishing vessels of greater than 15.24m overall length from fishing within the district. Most of the data used to compile the landings data has been taken from vessels greater then 15m working within the ICES rectangles adjacent to the proposed sites. There is an admission that data from the Under 10m sector is poorly recorded and not accurately represented in the Impact Assessment.

4.2.14 states that the estimated level of trawling landings affected by the closure of the sites would be approximately £658,000. From its records the Devon SFC can show which fishing vessels have been sighted within the proposed SAC boundaries. The under 10m vessels spend a greater percentage of their fishing time within the proposed areas and the annual earning of one under 10m is £53,600. Estimating that the vessel will spend 10% of its time in the proposed area will give a value of £5,360. Vessels over 10m spend a greater time outside of 6nm but sightings data show these vessels fishing within the proposed SAC areas. The average landing value for one of these vessels is £146,200 Estimating that the vessel would spend 10% of its time in the proposed area would give a value of £14,620. The value to these two vessels is £19,980. This value is for vessels working within the Devon area of the proposed area and does not include vessels working around the Eddystone area. The percentage of time spent fishing within the areas is based on a conservative average of 180 days at sea per year. There are 4 under 10m vessels working within the Devon SFC district that will be impacted by the proposed areas. There are 6 over 10m vessels working in the Devon SFC district that will be impacted by the proposed areas.

4.2.15 gives a value for scallops and mussels landed from within the proposed area to be £190,000 in total. Using Devon SFC sightings data it can be demonstrated that 7 under 10m vessels work within the proposed areas and 13 over 10m vessels work within the areas during the year. The under 10m vessels spend 20% of fishing time within the areas and the over 10m vessels spend 5% time fishing within the areas. The scallop landing value for one of the under 10m vessels working this area is £35,400, which gives a value of £7,080. One vessel of over 10m working in the area landed £387,400 of scallops, which gives a value of lost area as

£19,370. For just two vessels working within the proposed areas there would be a loss of £26,450.

4.2.20 list values for the crustacean catches from pots and the affect of a 50% reduction in potting effort. The value given is £78,000. . A potting survey undertaken by Devon SFC managed a return of 45% completed forms. This identified 12 vessels fishing within the proposed areas. Sightings data from the patrol vessel confirmed 12 vessels fishing in the areas. Using data from MFA landing sheets a single vessel working 670 pots within the Prawle Point to Plymouth area earned £72,000 per year, a 50% reduction in pots could lead to a loss of 25% of the catch which would reduce the earnings by £18,000.

4.2.22 suggests a cap on effort of 50% on all fishing gear with any bottom contact. The value suggested is £37,000 per year. This method will include netting of which there are 10 vessels working in the proposed areas. One over 10m vessel working within the Prawle Point to Plymouth area landed £20,490 of fish caught in nets. One under 10m vessel working in the area landed £6,000 of fish. Assuming a reduction in catch of 25% due to the reduction of gear by 50% the value lost by the two vessels would be £6,472.

4.2.27 looks at the introduction of a maximum landing size for crustaceans and then estimates that this measure would reduce landing by 25%, with an estimated value of £37,000 loss to the industry. There are 12 vessels fishing crab pots within the Devon SFC district that will be affected by the new proposed area. An average value for each boat of £59,944 was taken from Devon SFC survey. Taking the value of the fishery, then reducing it by 25% due to the reduction in pot numbers, then the 25% reduction from implementing a proposed maximum size gives a value of £33,718 per vessel which is a loss in earnings potential of £26,226 averaged across the 12 fishing boats, this gives a total value lost of £314,712.

From Devon SFC landing data an introduction of a maximum lobster landing size to 125mm would lead to a 5% reduction in landings giving a value of £269,700.

2.2.31 the figure of £830,000 per year loss to the entire fishery affected by the proposed restrictions is very low compared with the limited data submitted in this reply. With the limited information contained within this reply the vessels affected by the proposed restrictions not including the additional control methods would suffer a £332,130 reduction in landings per year has been calculated.

*Direct impact on the fishing sector* – there is a comment fishing vessels can change between methods. This may not be possible for all vessels within the fleet as small inshore potters cannot safely move to other areas or readily change methods of fishing without a large capital outlay. Some vessels may not be capable of being used for alternative methods of fishing. The opportunity for mobile fishing gear vessels to change over to potting for crustaceans will be almost impossible. If the mobile fishing gear vessel has a shellfish entitlement on the vessel then a limited amount of shellfish can be landed, but it would not allow for the full time change to static gear. If the skipper wishes to fish for crustacean without a shellfish entitlement then the boat would have to be sold and a vessel purchased that has a full shellfish permit. This will have two effects viz value of mobile fishing gear vessels within the areas will diminish and the value of vessels with a shellfish permit will rise. The increased effort into the crustacean fishery will be difficult to absorb on the south Devon coast as most of the grounds available to this fishery are fully utilised. If the vessels were to move away from these areas to exploit other grounds they would be in direct conflict with other fishing methods resulting in increased gear conflict issues. If a fishing vessel has only fished for scallops in the past three years there is no entitlement to fish quota fish other than as a bycatch.

4.2.38 suggests that the implementation of the minimum management measures would result in a zero cost to the fishery.

A value is then calculated for the cost of maximum reduction in net income using a reduction of 15.4% and a value to the industry of £702,000. Again using the very limited data shown in this reply the five vessels earn £724,200.00, reduce this amount by 15.4% and the value lost to the industry for these five vessels would be £111,523.60.

4.2.40 this section deals with the reduction in income throughout the local and regional economy as a result of the proposed measures. The value given in the IA is £0.833m per year. Using the multipliers for the vessels that have been used in this document a value of :-

| | | | |
|---|---|---|---|
| Demersal activity = | £52,902 | multiplied 1.9 | = £100,513.80 |
| Shellfish activity = | £59,944 | multiplied 2.4 | = £143,865.60 |
| Total | | | = £244,379.40 |

This is from only six vessels working within the proposed areas out of a total of 52 fishing vessels identified as fishing within the proposed area.

The estimated job losses again using a multiplier show of 80 jobs to the area. Using the data in this document the loss caused by the reduction in earnings to the six vessels used as an example would result in 29 job losses as a result of the proposed measures.

*Costs to Government of Administering Regime*

ii. Monitoring and enforcement

The IA suggests that the estimated cost to the MFA would be £28,000 per year and that SFC/IFCA costs have not yet been assessed.

The estimated cost makes no mention of the cost of generating byelaws to help with management of the sites. Estimated on previous experience a figure of between £3,000 and £5,000 per byelaw would be required depending on the complexity of the Regulatory Impact Assessment required. There may also be a requirement for a public enquiry for a contentious byelaw which would add considerably to the costs of the work.

If the MMO are to introduce byelaws for management of the proposed areas it will fall to the SFC/IFCA to enforce at sea.

The SFC/IFCA would suggest that additional patrols are likely to be significant during the first two years after the implementation of the proposed sites especially if the maximum measures were to be progressed. The enforcement of the new byelaws are likely to cost in the region of £20,000 based on 100 patrols a year by the patrol vessel and an additional 1 hour work per patrol. This would be in addition to the costs estimated by the MFA of £28,000.