



**D&S IFCA's Response  
to MLA/2020/00225  
Dawlish Sea Wall Stage 2**

**August 2020**

D&S IFCA has read the Marine Licence Application 2020/00225 and associated documents and would like to highlight a few points for consideration. Please see this document as the response to the consultation.

The Draft Prior Approval Letter dated 4th June 2020 details the use of the Wave Walker and shows the seaward extent of the movement of this piece of machinery, which will likely extend some distance into the deeper tidal area to remove limitations of working with the tide. Some concern is raised here due to the potential interaction and displacement of the fishing activities of small vessels operating out of the ports of Exmouth and Teignmouth. There is known to be potting and netting activities quite close inshore along this stretch of the coast. It would be useful to try and ensure any potential interaction with these activities is minimised. Potting and netting activities along this stretch of coast as indicated in Figures 1 and 2 below.

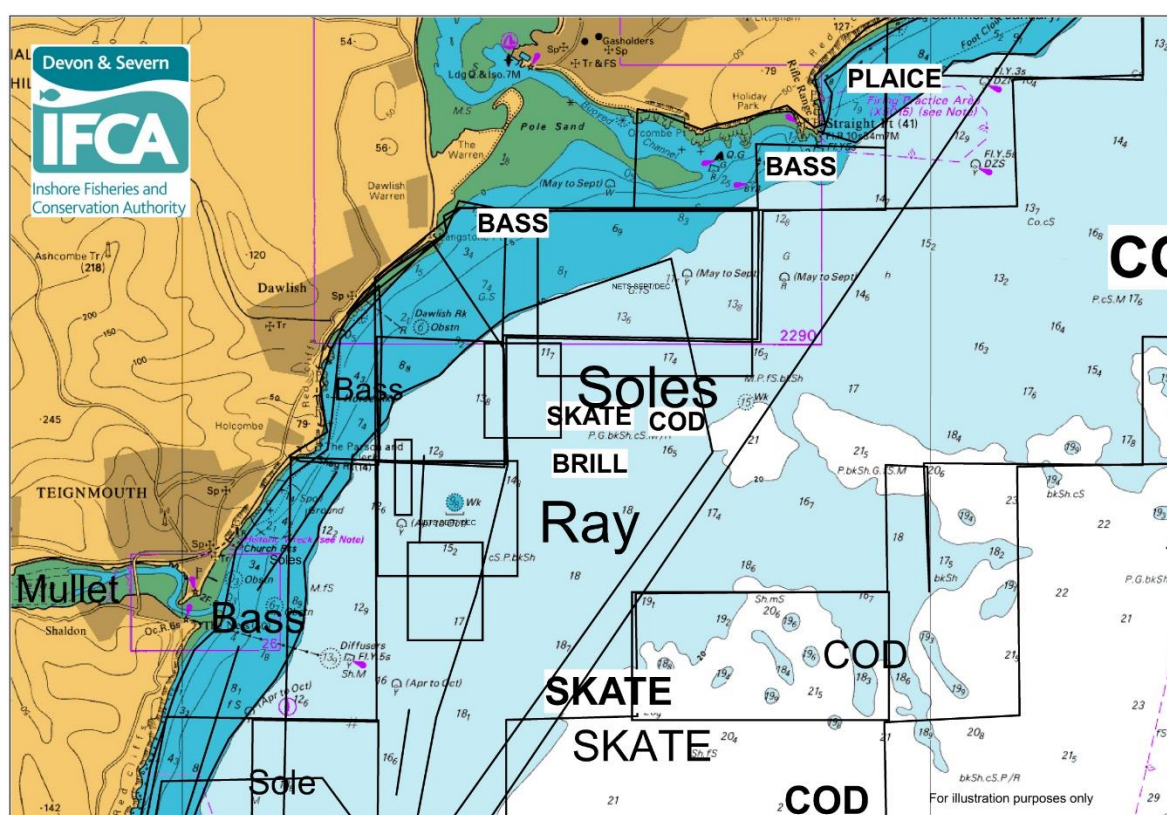


Figure 1 Netting Activity in the Vicinity of Dawlish

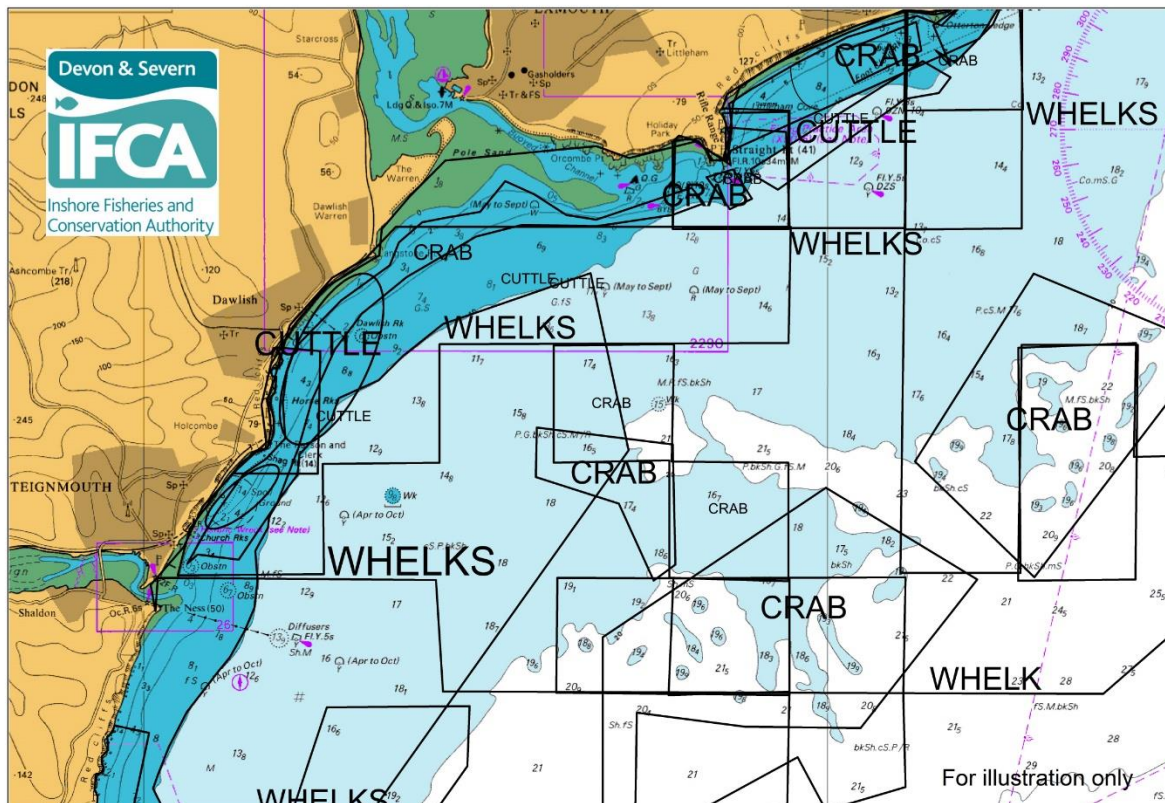


Figure 2 Potting Activity in the Vicinity of Dawlish

D&S IFCA has, in the past, undertaken fishing activity surveys with a proportion of fishermen responding to the survey. A survey of the commercial potting and netting fisheries in 2014 from East Devon ports, Exmouth, Teignmouth and Torbay had responses from 25 potters fishing from these ports (out of 79 currently holding D&S IFCA permits) and 23 netters (out of 62 currently holding D&S IFCA permits). The areas fished by those fishers responding to the survey are shown in Figures 1 and 2 above. The grounds are important for crabs, cuttlefish, whelks and for cod, plaice, bass, rays to name a few species. The documentation included in the MLA describes the possibility of increased sedimentation caused by the pilings and general workings on the site, which could cause localised smothering of fish and shellfish species that inhabit the area, and have their feeding or spawning grounds along this part of the coast. This could potentially impact the fishing industry in the area. It should be noted that there are demersal fishing boats that operate along the coast, fishing for a variety of fish species and dredging for scallops, although it is unlikely that they will be operating so close inshore to interact with the proposed works although an increase in sediment load may affect target species.

The SEA Interim Report, dated October 2016, provides a comprehensive strategic environmental assessment which supports the Resilience Strategy. There are several points within this report that D&S IFCA would like to highlight. Chapter 6 - Section 2 Dawlish Warren to Kennaway Tunnel provides detail of the stretch of coast in question and considerations against work proposed. Under 6.3.2.1 there is no mention of commercial fisheries that may operate along this stretch of the coast. Under Section 6.3.2.3 there is mention of potential nursery grounds for mackerel, whiting, plaice, lemon sole and sole. As can be seen from Figure 1 the netting activity along this stretch of the coast targets bass, sole, cod, brill, skates and plaice. There is no mention of the shellfish species that are potted for, such as whelks and crabs, and occur along this stretch of the coast. The Exe and Teign Estuaries are both designated Bass Nursery Areas. There are protected shellfish waters in the Exe Estuary and Teign Estuary, and classified shellfish harvesting areas in

these sites as well as at the mouth of the Exe and in Labrador Bay. Figures 3 to 7 below show these areas. It is important that the applicant is aware of these areas and takes what mitigating actions are possible to reduce sedimentation loadings which could reach these shellfish areas and potential impact the fisheries. Figure 8 also show the largest rope grown mussel farm in Europe located in Lyme Bay. This is some miles from the proposed works and is therefore unlikely to be impacted by them, but the chart has been submitted for information.

In section 6.3.3, Assessment of the preferred option, there is no mention of the shellfish classified harvesting areas that are located close to Section 2a ( 204m 56ch to 204m 70ch section) of the proposed works. Whilst the SEA and HRA have taken into account the potential impact on the designated features of the European Marine Site, D&S IFCA would like there to be consideration of any impact from the works in terms of increased sedimentation that could lead to smothering of the intertidal and sub-tidal shellfish in the vicinity of works. In Section 6.3.4 of the SEA again there is mention of increased sedimentation which potentially could cause some impact to the local fisheries – finfish and shellfish as described above.

D&S IFCA is reassured to see under Table 6-6 of the SEA that environmental objectives have been set out to include the maintenance of commercial fishing activity and fisheries around the Exe and Teign and that the strategy is to have a neutral impact, although there is no mention of the small scale fisheries along the coast covered by the Dawlish to Kennaway Tunnel sections of proposed works.

A number of potentially significant adverse impacts of the proposed works have been documented in the Resilience Strategy's HRA screening document. This document notes the potential for likely significant effects to features and sub-features of the SPA and SAC and recommends further work is undertaken in consideration of the integrity of the conservation interests of the SPA and SAC. D&S IFCA is reassured that the document states that 'it is anticipated that sufficient replacement intertidal habitat to mitigate or compensate for these losses will be provided in advance of the implementation of the proposals for these sections and that the successful delivery of this implementation is subject to strategic monitoring proposals outlined in Section 8'.

The applicant has including a *Sabellaria* Mapping Report within the MLA which is useful and important. As *Sabellaria* is a Biodiversity Action plan Priority Habitat, providing detailed information on its location is important for the operators to try and avoid interaction with this sensitive habitat.

D&S IFCA appreciates that there are uncertain impacts, and these have been addressed in terms of the strategy and design. Under Section 8 the SEA monitoring plan is discussed. It is important to see highlighted the possible impact of the scheme highlighted in particular those relating to shellfish harvesting areas, coastal fishing grounds and bass nursey grounds. There does not seem to be any maps that indicated the shellfish harvesting areas which should be included. Under the Appendix E- Environmental Baseline Section E 1.4.4 - 5, pp. 354/5 there is a description of the fisheries in the vicinity of the development which has been copied below. It would have been useful to have this information considered earlier in the SEA. Some of this text is incorrect and out of date. D&S IFCA has added text in red to update this:

*Fishing is economically important to both estuaries within the study area with mollusc shellfish farming being the largest single commercial fishery on the Exe (run by Exmouth Mussels). The Exe Estuary supports **one of** largest mussel *Mytilus* spp fishery in the Southwest. Within the study area,*



commercial shellfisheries are concentrated between Powderham and Starcross, *subtidally within the main channel of the Exe Estuary and at the mouth of the Exe Estuary. Much of this area is privately leased by Exmouth Mussels from the Earl of Devon. There is also recreational gathering of shellfish on Bull Hill Bank and Cockle Sands on the east side of the Estuary. Within the Teign Estuary there is a Regulating Order for Mussels and Oysters both of which are harvested commercially by the River Teign Shellfish Company. This commercial activity is significant in the South West. Downstream of the Shaldon Bridge there is recreational and gathering of shellfish including oysters, winkles and cockles. In May 2019 D&S IFCA introduced a Temporary Closure prohibiting the removal of mussels from the public Beds in the Exe (east side) and on the Teign below Shaldon Bridge, due a decline in the mussel stocks in these areas. Mussels are very important for birds such as Oystercatchers, especially within the Exe Estuary which is designated as a European Marine Site for its overwintering birds. Wild mussel beds provide an important fishery, which local residents have managed for generations and which has provided marketable grades of cockles *Cerastoderma edule*, winkles and mussels. The public wild shellfish beds within these estuaries are important for recreational hand gathering especially of cockles, winkles and pacific oysters. Bait collection fisheries are popular in both estuaries, and include crab tiling for collecting peeler crabs, sand eels and digging for polychaete worms.*

*There are also other molluscan shellfisheries within the vicinity of Exmouth and Teignmouth. These are a rope grown mussel farm at Labrador Bay (run by River Teign Shellfish) and the largest rope grown mussel farm in Europe located in Lyme Bay (Offshore Mussel Company).*

Both the Exe Estuary and the Teign are designated bass nursery areas whilst the waters outside the estuaries are potential spawning areas for lemon sole, sole and sprat. The waters outside the estuary are also potential nursery grounds for mackerel, whiting, plaice, lemon sole and sole.

*Devon and Severn Inshore Fisheries and Conservation Authority (D&S IFCA) manages the fisheries within its District out to six nautical miles. D&S IFCA issues permits to fishers undertaking netting, potting, diving and mobile gear activities within its District. Currently (2020) there are 15 commercial fishing vessels operating out of Exmouth that have been issued with permits to fish in D&S IFCA's District. The Exe Estuary supports significant fishing activity with ten commercial fishing boats operating out. Static gear is set for potting/whelking and cuttle trapping activities. Netting activity targets bass, sole, plaice, brill, cod and skates. There are six demersal gear vessels, trawlers and scallop dredgers, operating out of Exmouth. Commercial trawlers fish for mixed species such as sole, plaice, dab, flounder, turbot, brill, whiting, pollack, ling, conger eel, john dory, ray, gurnard, dogfish, monkfish, red mullet and black bream. Teignmouth supports an important small inshore fishing fleet, which is comprised of a combination of inshore potters, netters and an inshore scallop dredger/beam trawler.*

Teignmouth Harbour is a small commercial port supporting 9,300m<sup>2</sup> of warehousing plus a large quayside storage (<http://www.teignmouthharbour.com/shipping-commercial>). Cargo vessels land imports such as animal feed, fertiliser, blast-furnace slag, timber, building materials, stone, salt and coal, and export largely ball clay mined locally at Kingsteignton. There are over 800 shipping movements each year handling more than 600 tonnes of cargo (Teignmouth Harbour Commission, 2015).

The Teign and Exe and their tributaries, are important for Atlantic salmon and trout, providing migration routes. *D&S IFCA's Netting Permit Byelaw restricts the use of nets in some coastal areas including the area of the South Coast where the works are proposed, unless those nets are set 3 metres below the surface of the water at all states of the tide. This allows for the movement of salmon and sea trout along the coastal inshore waters.*

*Commercial trawlers fish for bass, Atlantic salmon, eel, edible crab, flounder, herring, lobster, sprat, mackerel, mullet, mussels, oysters, scallops, spider crab, whelk, winkles, and cockles.*

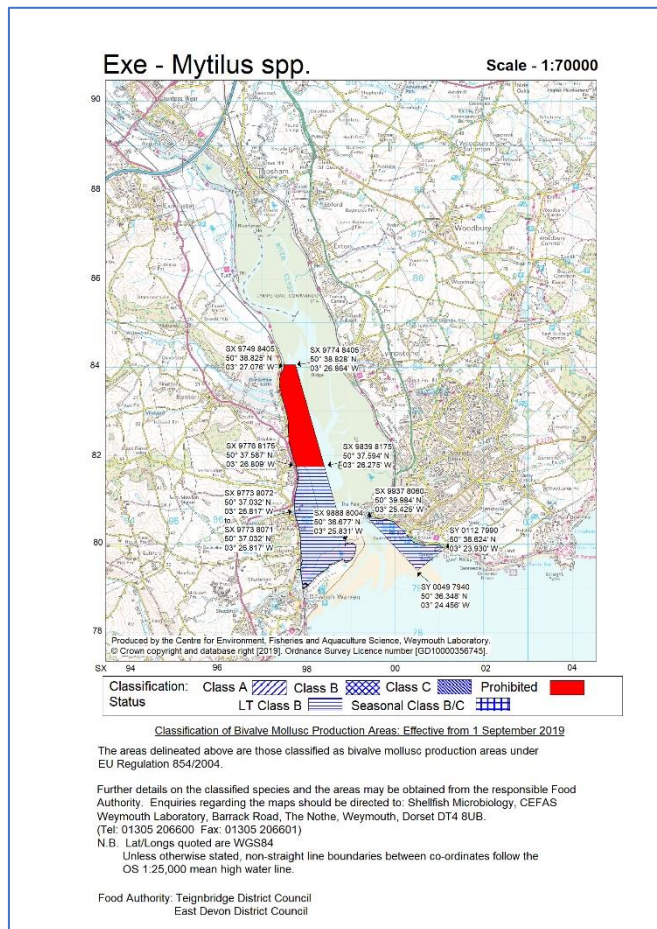


Figure 3 Classified Mussel Harvesting Areas - Exe Estuary

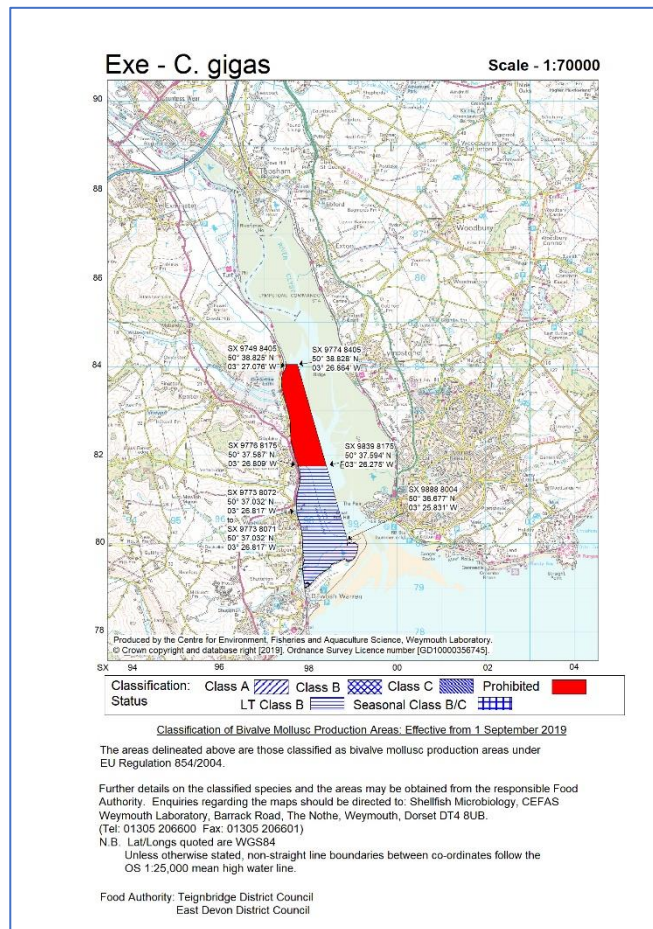


Figure 4 Classified Pacific Oyster Harvesting Areas - Exe Estuary

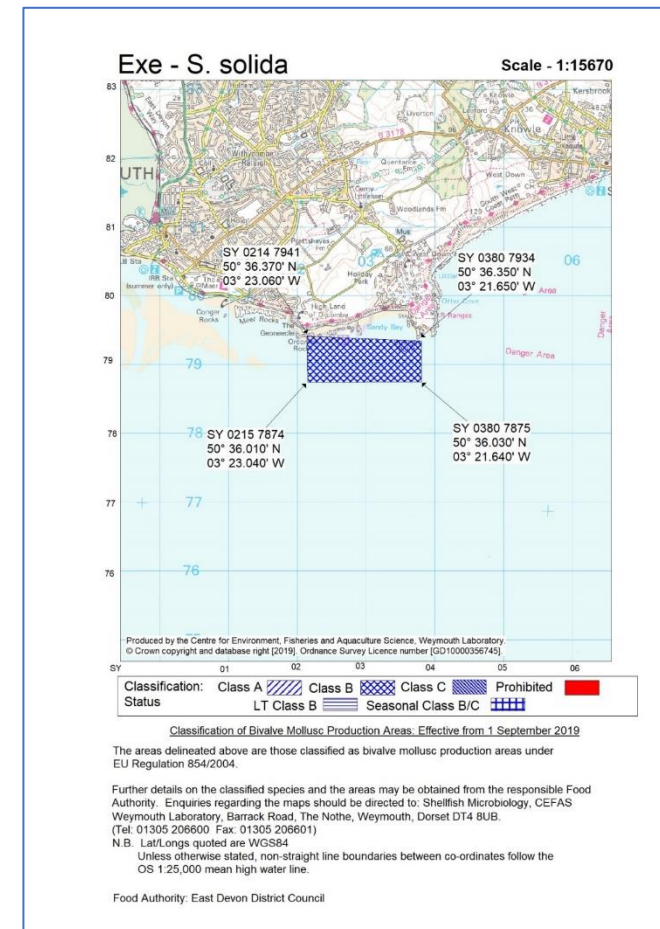


Figure 5 Classified *S. solidus* Harvesting Area Outside the Exe Estuary



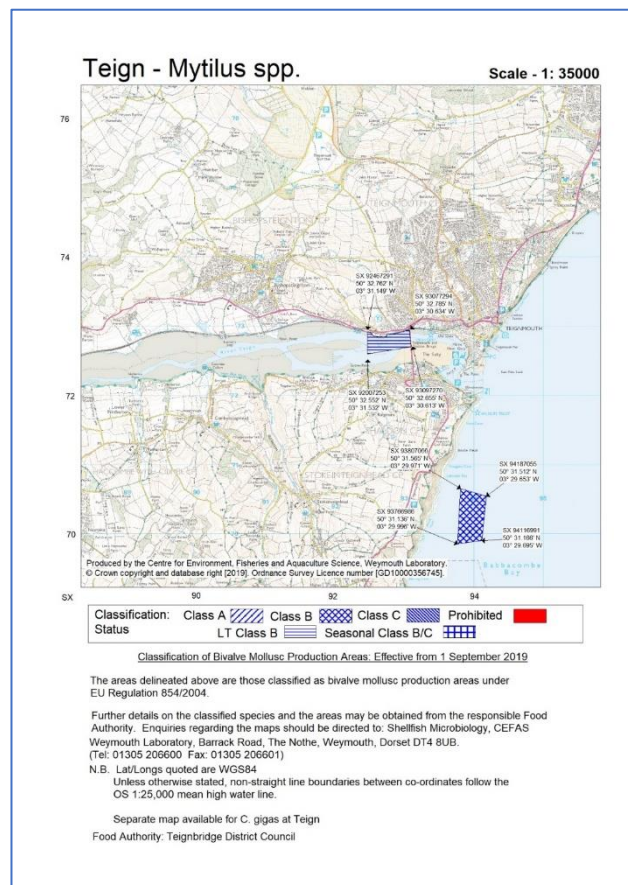


Figure 6 Classified Mussel Harvesting Areas - Teign

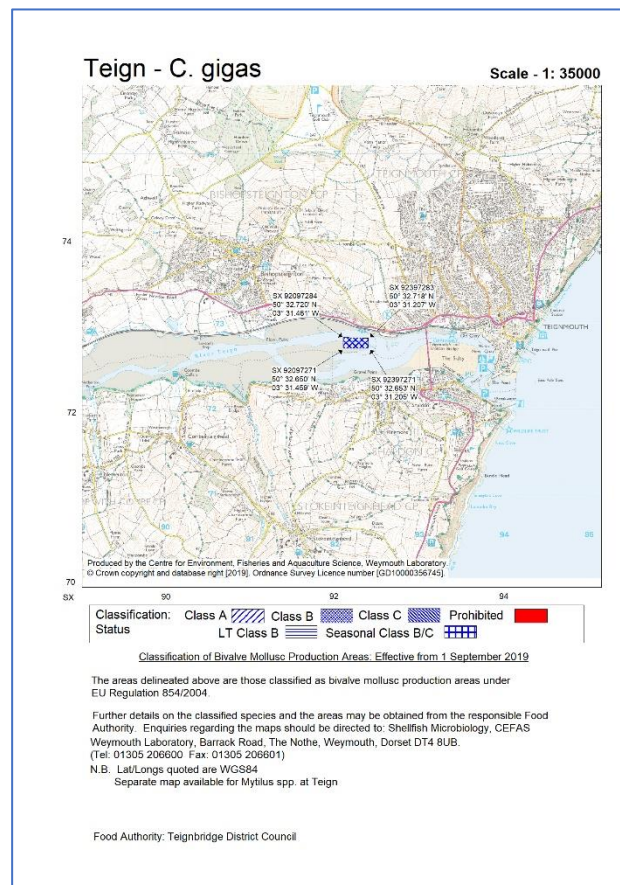


Figure 7 Classified Oyster Harvesting Areas - Teign

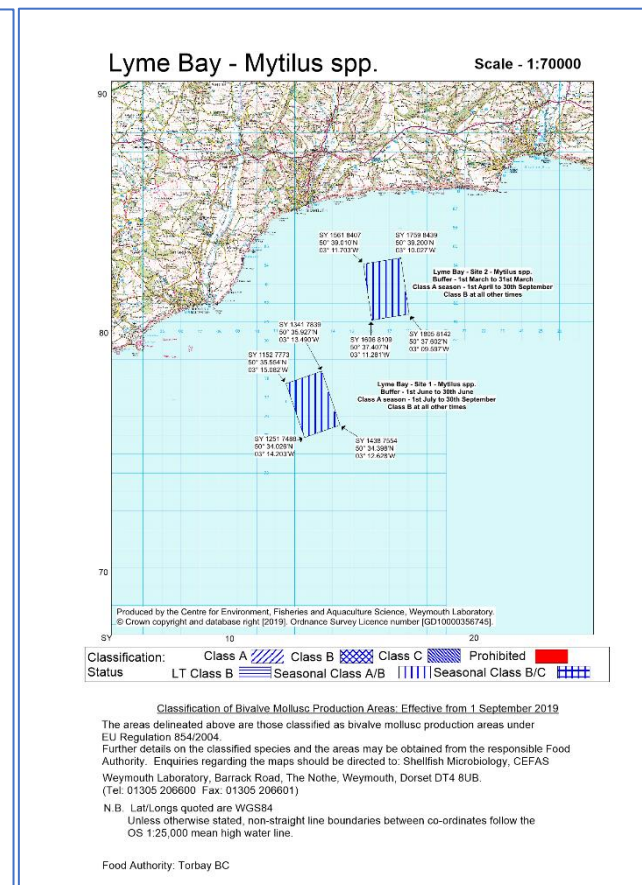


Figure 8 Classified Mussel Harvesting Areas – Lyme Bay

End.