



Inshore Fisheries and Conservation Authority

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29/04/2020

## Swansea Bay Tidal Lagoon Decommissioning Programme

Dear Mr Ambrose,

I am writing on behalf of Devon and Severn Inshore Fisheries and Conservation Authority (D&S IFCA), in response to your recent letter (dated 31<sup>st</sup> March 2020), regarding the consultation for the draft Decommissioning Programme for the Swansea Bay Tidal Lagoon (SBTL) project. D&S IFCA is the statutory manager of sea fisheries from baselines out to six nautical miles (or the median line with Wales), in the waters of the D&S IFCA's District. Though the SBTL project is proposed for areas of water that lie outside of the D&S IFCA's District, these waters form part of a large and connected ecosystem as part of the Severn Estuary and Bristol Channel. As you will be aware, the movement of waters and the fish within them transcends administrative boundaries; consequently, effects on fish in the vicinity of Swansea Bay have the potential to impact the ecosystems within the jurisdiction of D&S IFCA. It is in this context that I am writing to provide our input to this consultation process, recognising the ecosystem approach that it is desirable to take in matters such as this.

The document with which we were provided details several options for the decommissioning programme, and we would agree that "Option 4b" appears to be the most suitable in economic, environmental and social terms. We agree that, following the c. 120 years of proposed operation of the SBTL, the lagoon walls that are in place are likely to have become part of the local hydrodynamic system, and the local ecosystem may have largely adapted to incorporate the structures in place. We consider it unfortunate that this adaptation may have come at the cost of the ecosystem structure and function that we see in place today: D&S IFCA consider that SBTL may have large impacts on locally spawning species, migratory species such as shad, and other components of the marine environment, and may have broader impacts on the ecosystems of the Bristol Channel and Severn Estuary. However, this consultation response will focus on the draft Decommissioning Programme, rather than our position with regards to the impacts that the construction and operation of SBTL may have on fish and fisheries.

Given the length of the proposed operating life of the tidal lagoon (c. 120 years), it is almost impossible to accurately or reliably forecast the social, environmental or economic impacts that the decommissioning will have. It is with this in mind that we strongly recommend the completion of an Ecological Impact Assessment nearer to the time of proposed decommissioning. We therefore welcome the proposal that "EIA consultation will be commenced 3 years before proposed decommissioning". We would also recommend that the EIA be accompanied with consultation with local, relevant and statutory stakeholders to establish the likely social, environmental and economic impacts that the proposed decommissioning programme will have, and how these may be avoided, minimised or mitigated. This process would benefit from the financial flexibility to be able to undertake alternative decommissioning, maintenance and mitigation activities as required by the results of the aforementioned assessments and consultations. This flexibility could be developed, for example, through fundraising as detailed in the draft decommissioning programme.



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The draft decommissioning programme makes several claims about the potential for habitat creation and development, in addition to fisheries and mariculture changes that may occur post-decommissioning. We suggest that the likelihood of these benefits is highly uncertain, as are many aspects of the proposed decommissioning – including, for example, whether maintenance work (e.g. dredging) will be required and what its impacts may be. The resolution of these uncertainties is likely to depend on better knowledge and understanding of the contemporary state of the environment, and the needs of legitimate users of the marine environment. These factors will need to be considered within (for example) 2–5 years of the proposed commencement of decommissioning in order to make the most appropriate and beneficial decisions regarding the fate of SBTL, the local and regional environment, and all stakeholders.

Please contact me at the e-mail address above if you have any queries or would like to discuss this response further. Correspondence by post is likely to be less reliable and responsive while our activities are affected by the Covid-19 'lockdown' measures.

Yours sincerely,

James Stewart  
Senior Environment Officer