

# Marine Conservation Zone Assessment

**Site name:** Otter Estuary MCZ  
UKMCZ0065

**Protected feature(s):**  
Coastal saltmarshes and saline reedbeds

## **Fishing activities assessed at this site:**

### **Stage 1 Assessment**

**Intertidal handwork:** Handworking (access from vessel),  
Handworking (access from land)

**Miscellaneous:** Crab tiling

**Bait collection:** Digging with forks



**D&S IFCA Reference**  
OTT-MCZ-001

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Sarah Curtin	October 2021	Draft assessment	0.1
Sarah Curtin	February 2022	Updating assessments with call for information data	0.2
	April 2022	Minor amendments by SC	0.3
Sarah Clark	January 2023	Final Review	1.0

# 1. Introduction

This assessment has been undertaken by Devon & Severn Inshore Fisheries and Conservation Authority (D&S IFCA) in order to document and determine whether management measures are required to achieve the conservation objectives of marine conservation zones (MCZs). The IFCA's responsibilities in relation to management of MCZs are laid out in Sections 124 to 126, & 154 to 157 of the Marine and Coastal Access Act 2009.

## 2. MCZ site name(s), and location

The Otter Estuary MCZ is a small inshore site covering an area of approximately 0.11km<sup>2</sup>. The estuary is located on the south coast of Devon near the town Budleigh Salterton. The site extends from the mouth of the river up to the aqueduct near East Budleigh.

Although the Otter Estuary is small, it is an important ecosystem supporting a range of habitats and wildlife. It is an essential link from the sea to the River Otter where it acts as a migratory route for European eel, Atlantic salmon, Sea trout and Shad. The mouth of the estuary is dominated by a shingle bank of intertidal coarse sediment extending from the west coast of the river. The sheltered areas behind the bank consist of highly productive intertidal mudflats and saltmarshes.

The Otter Estuary is one of the most extensive saltmarsh networks in Devon, providing important foraging grounds for wading birds and wildfowl and a sheltered refuge from high tide. Several species of specialised salt and flood-tolerant flowering plants can be found within the saltmarshes as well as an abundance of worms, crustaceans, and tiny snails.

The intertidal muds are a highly productive habitat and support a diverse range of species including ragworms, mudshrimps and the commercially important cockle. At low tide these areas form vital feeding grounds for wading and migratory birds, while at high tide flatfish and others migrate to these areas to forage for food (Defra, 2019).

Further information regarding the MCZ and its protected features can be found in the Otter Estuary MCZ Factsheet.

## 3. Feature(s) / habitat(s) of conservation importance (FOCI/HOCI) and conservation objectives

**Table 1 - Protected features relevant to this assessment**

Feature	General management approach
Coastal saltmarshes and saline reed beds	Maintain in favourable condition

The conservation objectives for these features are that they remain in, favourable condition.

## 4. Gear/feature interaction in the MCZ categorised as 'red' risk and overview of management measure

None - There are no gear/feature interactions in the MCZ that are categorised as 'red' risk.

## 5. Activities under consideration

### **Intertidal handwork: Handworking (access from vessel), Handworking (access from land)**

There is limited evidence of hand working or shore-based activities occurring within the Otter Estuary MCZ. No responses were received from a request for information (sent to 65 individuals). However, there is no evidence that it is not occurring at a low, undetected level and therefore cannot be completely ruled out.

### **Miscellaneous: Crab tiling**

Surveys were not undertaken on the River Otter in 2020 due to no tiles being present in previous years. It is therefore believed that this activity is not occurring in the Otter Estuary MCZ. However, there is no evidence that it is not occurring at a low, undetected level and therefore cannot be completely ruled out.

### **Bait collection: digging with forks**

D&S IFCA conducted bait digging surveys in summer and autumn of 2020. During these surveys no evidence was found of bait digging the Otter Estuary.

D&S IFCA circulated a request for information on bait digging to the local community and estuary forum members and landowners to gather evidence and better understand fishing activity within the site. No responses were received from the request for information to indicate that bait digging is occurring, and the estuary forum members and landowner advised that bait digging does not occur on the estuary. However, there is no evidence that it is not occurring at a low, undetected level and therefore cannot be completely ruled out.

See Curtin (2021) for more information regarding fishing activities occurring in the Otter Estuary MCZ.

## 6. Is there a risk that activities are hindering the conservation objectives of the MCZ?

**Yes,**

### **Evidence:**

To determine whether each pressure is capable of affecting (other than insignificantly) the site's feature(s), the sensitivity assessments and risk profiling of pressures from the advice on operations section of the Natural England conservation advice package were used (Natural England, 2021). Table 2 shows the fishing activities and pressures included for assessment. The justifications for the pressures chosen for inclusion in this assessment can be seen in Annex 2.

**Table 2 - Fishing activities and pressures included in this assessment.**

Activity	Pressures
Shore based activities: Hand working, crab tiling, bait collection	Abrasion/disturbance of the substrate on the surface of the seabed
	Habitat structure changes - removal of substratum (extraction)
	Penetration and/or disturbance of the substratum below the surface of the seabed, including abrasion
	Removal of non-target species

The relevant targets for favourable condition were identified within Natural England's conservation advice supplementary advice tables (Natural England, 2021). Table 3 shows which targets were identified as relevant to the activity assessed. The impacts of pressures on features were

assessed against these targets to determine whether the activities causing the pressures are compatible with the site's conservation objectives.

**Table 3 - Relevant favourable condition targets for identified pressures.**

Feature	Attribute	Target
Coastal saltmarshes and saline reedbeds	Distribution of the feature, including associated transitional habitats, within the site	Maintain the range and continuity of the habitat and its natural transitions within saltmarsh types and to other habitats seaward and landward.
	Extent of the feature within the site	Maintain the total extent and spatial distribution of coastal saltmarshes and saline reedbeds
	Structure and function (including its typical species) key structural, influential and distinctive species	Maintain the abundance of the species listed to enable each of them to be a viable component of the habitat feature. Upper marsh and transitions: <i>Puccinellia maritima</i> , <i>Festuca rubra</i> , <i>Elymus pycnanthus</i> , <i>Phragmites australis</i> Mid upper marsh: <i>Puccinellia mar</i>
	Supporting processes: conservation measures (habitat)	Maintain the management measures (either within and/or outside the site boundary as appropriate) that are necessary to [maintain/restore] the structure, functions and supporting processes associated with the feature
	Supporting processes: water quality (habitat)	Where the feature is dependent on estuarine water, ensure water quality and quantity is maintained to a standard that provides the necessary conditions to support the feature

## 7. Can D&S IFCA exercise its functions to further the conservation objectives of the site?

Yes,

### Evidence: Monitoring and Control Arrangements

- Monitor activity levels
- Consideration of a new Hand Working Permit Byelaw to manage the use of crab tiles, bait digging and many other hand gathering types of fishing activity.

On the 14th November 2019, the D&S IFCA Byelaw & Permitting Sub-Committee discussed the different options that exist to manage hand working types of fishing activity as set out in a report (D&S IFCA, 2019). The development of a new byelaw was the option selected; however it is envisaged that it will be a slightly different regulatory format as compared to the D&S IFCA permit based byelaws already implemented to manage other fishing activity.

The potential need for a permit to conduct the different activities will become a factor in the on-going drafting work. It is envisaged that the requirement for a permit to conduct bait collection and hand gathering will be dependent on the amounts of resource taken. The Hand Working Permit Byelaw would introduce fixed provisions that apply to all persons. Fixed provisions are expected to include a series of catch limits (bag limits) for different species (sea fisheries resources) that are targeted by different types of hand working fishing methods. The bag limits would provide an upper level of catch (a threshold) that would apply to all persons but providing the individual take of the specified species was below the levels set for personal use, it is not envisaged that a permit would be required for the collection of the resources. Commercial activity would exceed the bag limits for recreational take and would therefore be regulated by conditions of use that would be

placed in the permits issued by D&S IFCA. D&S IFCA will be seeking the views of all stakeholders to better inform the decision making needed to set the initial bag limits.

The development of a Hand Working Permit Byelaw is now a longer-term commitment for D&S IFCA. As a reflection of the time and resource required and available to conduct the required elements of the work, including reporting and the decision-making of D&S IFCA's Byelaw and Permitting Sub-Committee, the development of this Byelaw is not included in D&S IFCA's 2022–2023 Annual Plan (D&S IFCA, 2022). Key Tasks for 2022-2023 reflect what is deliverable with the current level of staffing and financial resourcing available to D&S IFCA.

## **8. Referenced supporting information to inform assessment**

Bait digging has been found to have a range of impacts on both the sediment it occurs on, and the communities within it:

### **Impacts on saltmarshes and reedbeds**

Bait digging usually occurs to depths of 30cm, unearthing a deeper sediment that would usually remain undisturbed (Jackson and James, 1979). Changes can therefore occur in sediment characteristics as a result of bait digging. Undug sediment was found to have a higher organic content than dug sediment. The process of turning over the sediment and erosion of sediment mounds by tides and wave action leads to a loss of finer fractions and associated organic material.

If undertaken, bait digging on saltmarsh would cause major damage (Dyrynda 1995). However, this activity is not known to occur on this habitat, so the potential direct impacts of this activity are minimal (Boorman, 2003). Indirect effects are possible through trampling of saltmarsh/reedbeds whilst accessing bait digging areas (Boorman, 2003). The effects of trampling will depend on the condition of the saltmarsh, the intensity and frequency and longevity of the disturbance. Low-level chronic trampling of a saltmarsh in Wales over a period of 48 years resulted in increased species and community diversity. Another saltmarsh that was trampled for 17 years had fully recovered 12 years after the disturbance ceased (Headley and Sale, 1999).

Resilience to trampling will also depend on the location of the disturbance. Martone and Wasson (2008) found that trampling in tidally restricted areas required a longer recovery time. Interactions between trampling and restricting tidal flow resulted in significantly higher cover of non-native upland plants in trampled plots at tidally restricted sites.

As the activities described in table 2 are occurring at low levels the indirect effects of trampling are thought to be minimal.

### **Impacts on non-target species**

Bait digging can have adverse effects on a wide variety of species as a result of physical damage, burial, smothering and/or exposure to desiccation or predation to non-target invertebrates.

Recovery of small short-lived invertebrates will usually occur within a year, but populations of larger, long-lived invertebrates may take much longer (Fowler, 1999). In some extreme cases local diversity may be reduced, which may be especially true in physically fragile environments such as eelgrass or mussel beds (Fowler, 1999). Similarly, Beukema (1995) found that within a 1km<sup>2</sup> area of the Dutch Wadden Sea, the local lugworm stock declined by more than 50% over a four-year mechanical digging period. As a result of this decline, total zoobenthic biomass also declined, with short lived species showing a marked reduction during the digging period. Recovery of the benthos took several years, especially by the slower establishing species. However, if disturbance by digging is short term, benthic communities can recover within six months (Beukema, 1995).

Mosbahi et al. (2015) also explored the impacts of bait digging on the macrofauna of intertidal mudflats. The fauna of their study area (the tidal mudflats of Kneiss Islands, Tunisia) was mainly composed of polychaetes, the more abundant families being the Nereididae, Arenicolidae (fishing target species) and the Cirratulidae. They found the number of taxa and abundance of individuals

were affected by bait digging; the abundance estimates at the control stations were significantly higher than those estimated at the three stations before and after bait collection, with some polychaete species disappearing after one month of bait digging. This indicates that the intertidal macrozoobenthic biodiversity at the impacted stations is affected by the bait digging activity, or possibly by trampling.

Jackson and James (1979) investigated the effects of bait digging on cockle populations. They found that increased digging in an area caused higher cockle mortality, particular on smaller individuals. The cause of mortality was due to burial/smothering as individuals that were buried at a depth of 10cm rarely survived.

Rossi *et al.* (2007) investigated the effects of trampling on mudflats, such as that associated with recreational activities like bait digging. They found that trampling did not influence mobile species such as *Hydrobia ulvae* and *Hediste diversicolor*, but clearly modified the abundance and population dynamics of bivalves such as the clam *Macoma balthica* and the cockle *Cerastoderma edule*. There was a negative impact on adults of both species, which was attributed to footsteps directly killing or burying the animals, leading to asphyxia. Abundance of small-sized/juvenile *C. edule* showed no response to trampling. It is likely that the population-level abundance of small animals could recover more quickly because trampling occurred during the reproductive season (April to October), which meant that there was likely a continuous supply of larvae and juveniles in the water column to replace those displaced by the trampling. In contrast, trampling seemed to indirectly enhance the recruitment rate of *M. balthica*. In an environment with little trampling, adult cockles can easily outcompete larvae and spats of other bivalves; disturbance of sediment whilst feeding or moving and high filtration of planktonic larvae can reduce the settling and recruitment of other bivalves. The direct impacts of trampling (e.g. a reduction in adult cockle abundance), can therefore indirectly increase the recruitment opportunities for other bivalve species such as *M. balthica*, which take advantage of the reduced competition from *C. edule* adults. Over the long term, this could ultimately cause a shift towards a dominance of *M. balthica* in the macrofaunal assemblage, at the cost of *C. edule*, thereby potentially affecting ecosystem functioning. Therefore, despite potentially fast recovery times, Rossi *et al.* (2007) concluded that human trampling is a relevant source of disturbance for the conservation and management of mudflats.

Wynberg & Branch (1997) assessed the impacts of trampling associated with the use of suction pumps for the collection of prawns as bait, by comparing areas that had been sucked over with a prawn pump, to areas that had been trampled only. Prawn densities were depressed six weeks following both sucking and trampling but recovered by 32 weeks. Macrofaunal numbers declined in most treatment areas and macrofaunal community composition in the most-disturbed areas was distinct from that in other areas. They determined that the trampling itself has almost the same effect as sucking for prawns, on both the prawns and on the associated biota.

It is important to note that the effects on macrofaunal communities can differ substantially between estuaries. For example, the mud content of an estuary can affect the resilience of the communities to bait digging. Although Dernie *et al.* (2003) found that it was not possible to predict the recovery rates of assemblages based on percentage of silt and clay in the sediment, there was a good relationship between recovery rate and infilling rate, which is linked to the physical characteristics of the sediment. Clean sand habitats were the quickest to recover both in terms of physical and biological characteristics. Other studies have also found extended recovery times for estuaries with high mud content (Carvalho *et al.*, 2013).

The site-specific nature of the impacts of bait digging was also demonstrated by Watson *et al.* (2017). They found that responses were both site and disturbance type specific. Their data also showed that responses were not consistent between species (e.g. *Corophium volutator* and *Peringia ulvae*) or even between those within the same trophic group. They, therefore, concluded that bait collection alters the macrofaunal community and the associated sediment characteristics

across large spatial scales, but with the caveat that the strength (and type) of the response is site specific.

## 9. In-combination assessment

**Table 4 - Relevant activities occurring in or close to the site**

<b>Plans and Projects</b>		
<b>Activity</b>	<b>Description</b>	<b>Potential Pressure(s)</b>
No other plans or projects known to be occurring within Otter Estuary MCZ	The impact of future plans or projects will require assessment in their own right, including accounting for any in-combination effects, alongside existing activities.	N/A
<b>Other activities being considered</b>		
<b>Activity</b>	<b>Description</b>	<b>Potential Pressure(s)</b>
Static – pots/traps: Pots/creels, cuttlepots, fish traps	As there is little to no level of this activity in the Otter Estuary MCZ, no in-combination effect thought to be possible.	Abrasion/disturbance of the substrate on the surface of the seabed  Removal of non-target species  Changes in suspended solids (water clarity)  Penetration and/or disturbance of the substratum below the surface of the seabed, including abrasion  Smothering and siltation rate changes (Light)  Genetic modification & translocation of indigenous species  Introduction of microbial pathogens  Introduction or spread of invasive non indigenous species
Static – fixed nets: Gill nets, Trammels, Entangling	This activity is currently not permitted to take place within the Otter Estuary MCZ as it falls under the D&S IFCA Netting Permit Byelaw. In the estuary landward of the coordinates set out in Annex 1, Figure 3, a permit holder or named representative is not authorised to use any net other than a seine net. Therefore, no in-combination effect is thought to be possible	
Passive – nets: Drift nets (demersal)	This activity is currently not permitted to take place within the Otter Estuary MCZ as it falls under the D&S IFCA Netting Permit Byelaw. In the estuary landward of the coordinates set out in Annex 1, Figure 3, a permit holder or named representative is not authorised to use any net other than a seine net. Therefore, no in-combination effect is thought to be possible.	
Seine nets and other; Shrimp push nets, fyke and stakenets, ring nets	This activity is currently not permitted to take place within the Otter Estuary MCZ as it falls under the D&S IFCA Netting Permit Byelaw. In the estuary landward of the coordinates set out in Annex 1, Figure 3, a permit holder or named representative is not authorised to use any net other than a seine net. Therefore, no in-combination effect is thought to be possible. Additionally, as the activities assessed (section 5) are not occurring, it is thought there is no in-combination effect.	
Lines: Longlines (demersal)	As there is little to no level of this activity in the Otter Estuary MCZ, no in-combination effect thought to be possible.	Introduction or spread of invasive non indigenous species
Seine nets & other: Beach seine/ring	As there is little to no level of this activity in the Otter Estuary, no in-combination effect thought to be possible.	
Aquaculture	There is no evidence that this activity is currently occurring, no in-combination effect	



	thought to be possible.	
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D&S IFCA concludes there is no likelihood of significant adverse effect on the interest features from in-combination effects addressed within Table 4.

## 10. NE consultation response

N/A Natural England has not been consulted at this stage.

## 11. Conclusion

The literature detailed in section 8 found that bait digging and shore-based activities can have direct and indirect effects on saltmarshes and reedbeds. These effects could influence the sediment characteristics, the populations of the target species, and the macrofaunal communities if levels of shore-based activities were sufficiently high and over a prolonged period.

Within Otter Estuary MCZ, bait digging and hand gathering is not known to occur. Based on the current levels of these activities on the Otter Estuary there is not believed to be a significant impact of the shore-based activities on the protected features assessed. It is believed that these activities are either not occurring or occurring at low undetected levels, which likely gives the disturbed areas time to recover before they are revisited and disturbed again. The evidence presented in section 8 suggests recovery times for both sediment and smaller invertebrates that are impacted by trampling and digging are shorter when activity levels are low.

D&S IFCA concludes there is no likelihood of significant risk of the activities hindering the achievement of the conservation objectives for Otter Estuary MCZ.

D&S IFCA is considering the introduction of a new Hand Working Permit Byelaw to manage the use of crab tiles, bait digging and many other hand gathering types of fishing activity in the district. The introduction of a byelaw would introduce fixed provisions that apply to all persons. Fixed provisions are expected to include a series of catch limits (bag limits) for different species (sea fisheries resources) that are targeted by different types of hand working fishing methods. The bag limits would provide an upper level of catch (a threshold) that would apply to all persons thus limiting the effort of shore-based activities on the Estuary. As outlined in section 7, the development of a Hand Working Permit Byelaw is now a longer-term commitment for D&S IFCA and has not been included in D&S IFCA's Annual Plan for 2022–2023.

## 12. Summary table

Feature or habitat of Conservation interest	Conservation objectives/ Target Attributes (Natural England, 2021)	Activity	Potential pressures from activity and sensitivity of habitats to pressures. (Natural England, 2021)	Potential exposure to pressures and mechanism of impact significance	Is there a risk that the activity could hinder the achievement of conservation objectives of the site?	Can D&S IFCA exercise its functions to further the conservation objectives of the site?  If Yes, list management options
Coastal saltmarshes and saline reedbeds	<p>Maintain the range and continuity of the habitat and its natural transitions within saltmarsh types and to other habitats seaward and landward</p> <p>Maintain the total extent and spatial distribution of coastal saltmarshes and saline reedbeds</p> <p>Maintain the abundance of the species listed to enable each of them</p>	<p>Commercial fishing;</p> <p>Intertidal handwork: Handworking (access from vessel), Handworking (access from land)</p> <p>Miscellaneous: Crab tiling</p> <p>Bait collection: digging with forks</p>	<ul style="list-style-type: none"> <li>•Abrasion/disturbance of the substrate on the surface of the seabed</li> <li>•Habitat structure changes – removal of substratum</li> <li>•Penetration and/or disturbance of the substratum below the surface of the seabed, including abrasion</li> <li>•Removal of non-target species</li> </ul> <p>See Annex 2 for pressures audit trail</p>	<p>If undertaken, bait digging on saltmarsh would cause major damage (Dyrynda 1995). However, this activity is not known to occur on this habitat, so the potential direct impacts of this activity are minimal (Boorman, 2003). Indirect effects are possible through trampling of saltmarsh/reedbeds whilst accessing bait digging areas (Boorman, 2003). The effects of trampling will depend on the condition of the saltmarsh, the intensity and frequency and longevity of the disturbance. Low-level chronic trampling of a saltmarsh in Wales over a period of 48 years resulted in increased species and community diversity. Another saltmarsh that was trampled for 17 years had fully recovered 12 years after the disturbance ceased (Headley and Sale, 1999).</p>	<p>Activities not believed to be occurring or occurring at a very low level.</p> <p>At the current levels of activity, D&amp;S IFCA conclude that there is no significant risk of the activities hindering the achievement of the conservation objectives.</p>	<p>Yes,</p> <p>Management measures could include:</p> <ol style="list-style-type: none"> <li>1. Monitor activity levels</li> <li>2. Possible introduction of a new Hand Working Permit Byelaw to manage the use of crab tiles, bait digging and many other hand gathering types of fishing activity.</li> </ol>

	<p>to be a viable component of the habitat feature. Upper marsh and transitions: <i>Puccinellia maritima</i>, <i>Festuca rubra</i>, <i>Elymus pycnanthus</i>, <i>Phragmites australis</i> Mid upper marsh: <i>Puccinellia mar</i></p> <p>Maintain the management measures (either within and/or outside the site boundary as appropriate) that are necessary to [maintain/restore] the structure, functions and supporting processes associated with the feature</p> <p>Where the feature is</p>			<p>Resilience to trampling will also depend on the location of the disturbance. Martone and Wasson (2008) found that trampling in tidally restricted areas required a longer recovery time. Interactions between trampling and restricting tidal flow resulted in significantly higher cover of non-native upland plants in trampled plots at tidally restricted sites.</p> <p>Mosbahi <i>et al.</i>, (2015) also explored the impacts of bait digging on the macrofauna of intertidal mudflats. The fauna of their study area (the tidal mudflats of Kneiss Islands, Tunisia) was mainly composed of polychaetes, the more abundant families being the <i>Nereididae</i>, <i>Arenicolidae</i> (fishing target species) and the <i>Cirratulidae</i>. They found the number of taxa and abundance of individuals were affected by bait digging; the abundance estimates at the control stations were significantly higher than those estimated at the three stations before and after bait collection, with some polychaete species disappearing after one month of bait digging. This indicates that the intertidal macrozoobenthic biodiversity at the impacted stations is affected</p>		
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	dependent on estuarine water, ensure water quality and quantity is			<p>by the bait digging activity, or possibly by trampling.</p> <p>Olive (1993) describes the scenario which led to complete removal of all lugworms from a large area of a National Nature Reserve in Northumberland in 1984, with densities falling from <math>&gt;40\text{m}^{-2}</math> to <math>&lt;1\text{m}^{-2}</math>. When the site was closed to bait digging it repopulated within a matter of months, thanks to the presence of extensive non-exploited populations nearby. Similarly, lugworm populations in the Dutch Wadden Sea appear to be unaffected by large scale commercial exploitation, with an estimated <math>2 \times 10^7</math> individuals taken annually. However, Cryer et al. (1987) found no recovery in worm densities after 6 months following experimental removal, although natural densities at the test site in South Wales were low (<math>9\text{-}16\text{ m}^{-2}</math>) and the survey ran through the less productive winter months. The capacity of a population to withstand bait digging activities therefore relies on a number of factors including the size of the exploited area relative to the total lugworm bed, the presence of other lugworm beds nearby, the presence of nursery areas, the relative exploitation of adult and juvenile lugworms, and the intensity and</p>		
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				seasonality of bait digging. However, on the whole they are thought to be resilient to bait digging		
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## 13. References

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## Annex 1: Site Map(s)

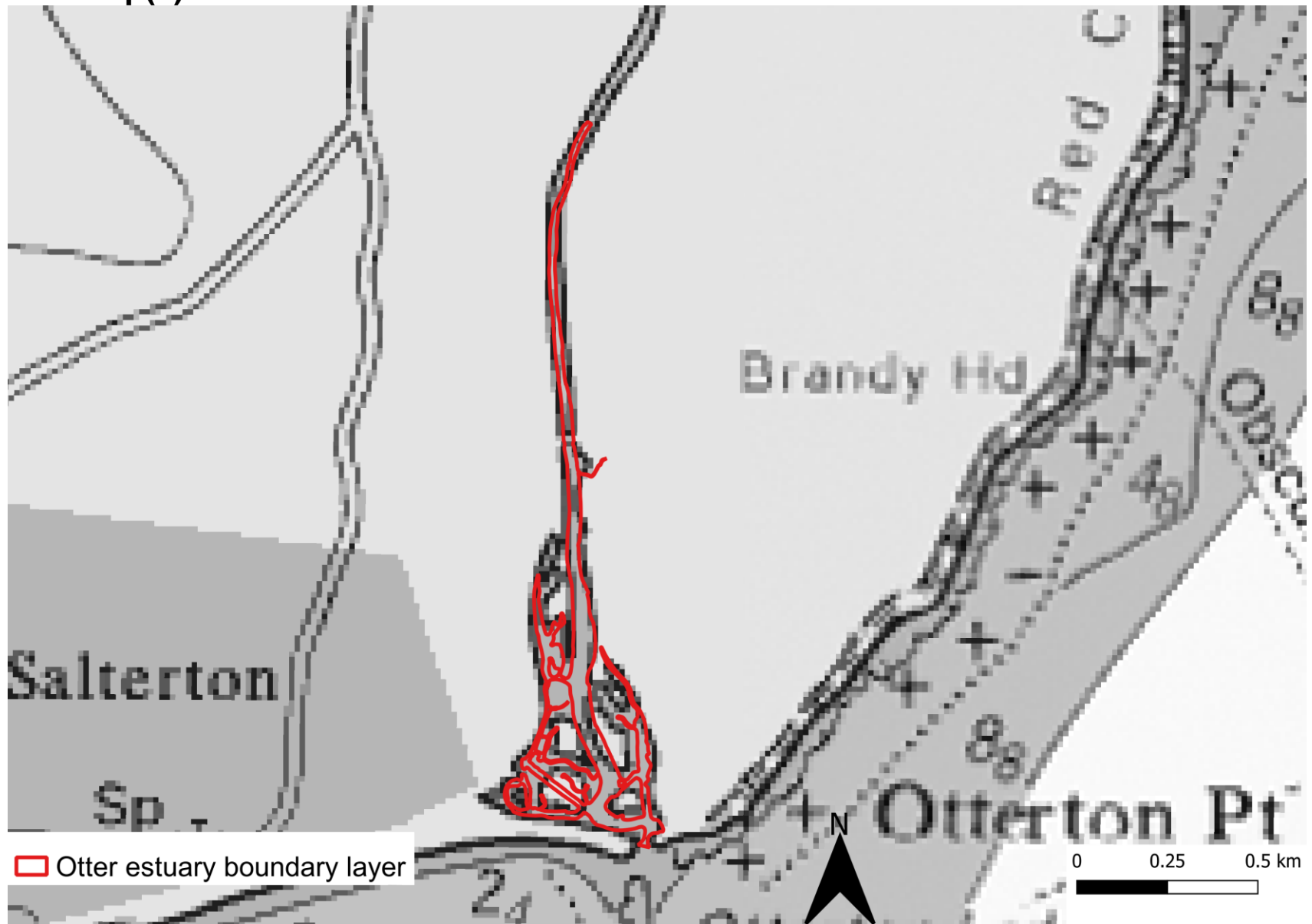


Figure 1 – Otter Estuary MCZ





**Figure 2: Extent of features, intertidal coarse, intertidal mud, and coastal saltmarshes and saline reedbeds) designated in the Otter Estuary MCZ**

**Annex 2 Chart of River Otter closing line - No access for the use of nets other than a seine net in accordance with paragraph 3.2 of the Netting Permit Conditions**



— Estuary closing line

River Otter closing line latitude and longitude positions:

Point	Latitude	Longitude
A	50° 37.791'N	003° 18.676'W
B (Otterton Ledge)	50° 37.626'N	003° 18.399'W
C (Otterton Point)	50° 37.821'N	003° 18.143'W

**Figure 3: River Otter closing line latitude and longitude, from Annex 2 to the Netting Permit Byelaw. No access landward of the line to the use of nets other than a seine net in accordance with paragraph 3.2 of the Netting Permit Conditions.**

## Annex 2: Pressures Audit Trail

Fishing Activity Pressures: Shore based activities	Coastal saltmarshes and saline reedbeds	Screening Justification
<a href="#">Abrasion/disturbance of the substrate on the surface of the seabed</a>	<u>S</u>	IN – Need to consider spatial scale/intensity of activity to determine likely magnitude of pressure
<a href="#">Habitat structure changes - removal of substratum (extraction)</a>	<u>S</u>	IN – Need to consider spatial scale/intensity of activity to determine likely magnitude of pressure
<a href="#">Penetration and/or disturbance of the substratum below the surface of the seabed, including abrasion</a>	<u>S</u>	IN – Need to consider spatial scale/intensity of activity to determine likely magnitude of pressure
<a href="#">Removal of non-target species</a>	<u>S</u>	IN – Need to consider spatial scale/intensity of activity to determine likely magnitude of pressure
<a href="#">Removal of target species</a>		OUT – Not applicable
<a href="#">Deoxygenation</a>	<u>NS</u>	OUT - Insufficient activity levels to pose risk at level of concern
<a href="#">Hydrocarbon &amp; PAH contamination</a>	NA	OUT – Not applicable
<a href="#">Introduction of light</a>		OUT – Not applicable
<a href="#">Introduction or spread of invasive non-indigenous species (INIS)</a>	<u>S</u>	OUT – Insufficient activity levels to pose risk at level of concern
<a href="#">Litter</a>	<u>S</u>	OUT – Insufficient activity levels to pose risk at level of concern
<a href="#">Synthetic compound contamination (incl. pesticides, antifoulants, pharmaceuticals)</a>	NA	OUT – Not applicable
<a href="#">Transition elements &amp; organo-metal (e.g. TBT) contamination</a>	NA	OUT – Not applicable