



Devon and Severn Inshore Fisheries and Conservation Authority.  
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Natural England,  
Polwhele,  
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Dear Sarah,

### **Skerries Bank and Surrounds MCZ Condition Assessment**

Thank you for your reply to Natural England's Condition Assessment dated 13 June 2023. This letter is in response to Devon and Severn IFCA's letter (attached below). This letter outlines some changes made to the condition assessment considering Devon and Severn IFCA's response.



D&S IFCA Response  
for Skerries Bank and

The condition assessment has been assigned low confidence overall due to the age of the surveys and gaps in data we have available for the site. There have been no site-specific surveys of which we are aware that are more recent than 2017. However, we hope to improve our understanding of the site with further monitoring. We understand that Devon and Severn IFCA have some concern over the validity of data (specifically Curtis *et al.*, 2015); however, we must assess the condition of our sites with the data we have available, whether this is the extent and distribution of a feature or any of the other attributes. Although there have been points raised in your response letter regarding the validity of Curtis *et al.*, 2015, we base our confidence on the MESH score of the data, for which this scores 75. We recognise some of the points made in your response letter around the extent and distribution of some of the features of the site; however, we have no access to any evidence that changes our current assessment, and we must use the GI outputs of this data as they are currently interpreted.

While we also recognise the important implications of the evidence presented on the history of the designation of the site, and the long-standing management agreement represented by the South Devon Inshore Potting Agreement (IPA), we cannot take these matters into account when undertaking a condition assessment.

We recognise some of the concerns raised in your letter and have made some changes to the condition assessment to reflect this, which are as follows:

- We will include the response letter (attached above) from Devon and Severn IFCA as a reference in the condition assessment for the relevant features and attributes.

### **Moderate Energy Circalittoral Rock**

- We will include the specific figure of 0.5602km<sup>2</sup> for the extent and distribution of moderate energy circalittoral rock as it is currently expressed as 15.56% of 3.60km<sup>2</sup> without showing the

sum figure of 0.5602km<sup>2</sup>.

- We will change the language used around sediment veneers throughout the assessment. For example, where the current assessment states a 'strong likelihood' this will be changed to 'a likelihood'. We understand that we have no conclusive evidence of veneers, but we can make inferences from the biotopes present which are typical of heavily sediment influenced environments.
- We will rectify the dates around the start of voluntary management for the South Devon IPA (1978).

### **Subtidal Coarse Sediment**

- Natural England accept that natural spatial variation cannot be ruled out when considering the biological communities present. Please refer to the below paragraph which also highlights that as this demersal fishing activity has been in place before predicted baselines, it is unclear what communities would otherwise naturally occur:  
*"Furthermore, the annual activities (specifically demersal towed fishing) permitted across certain zones of the MCZ have been in place since before the predicted baseline used for this analysis. Therefore, a true understanding of the benthic communities that would naturally occur in these areas cannot be ascertained."*
- It is noted under the attribute 'Distribution: presence and spatial distribution of biological communities' that whilst recolonisation is attainable for particular species associated with the biological community A5.141, a full biomass recovery is not presently achievable within the timeframes provided between demersal fishing activity.
- Wording has been adapted around sample data pointing towards demersal towed gear being responsible for the absence of A5.15 'deep circalittoral sediment'. To confirm, the conclusions made as to why the attribute 'Distribution: presence and spatial distribution of biological communities' failed to meet its target is based on the wider discussion noted in the 'rationale for judgement'. This provides a full summary and concludes that the pressures observed cannot provide sufficient recovery periods for the biological communities associated with subtidal coarse sediment.

To summarise, whilst we understand the importance of the site from a socio-economic point of view the, the condition assessment focuses on the environmental condition of the sites features using the best available evidence. The condition assessment has had input and support from Natural England's national specialists and Area Team Manager sign off, therefore we will be publishing our condition assessment this week (w/c 31<sup>st</sup> July).

Yours sincerely,

*J. Boyle*

**Jay Boyle**

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