

Wembury Marine Conservation Area Advisory Group – Responses to Consultations 2019

[Plymouth City Council - Plymouth Sound National Marine Park Engagement Document
February 2019](#)

[Devon County Council - Proposal to upgrade Wembury Parish footpath
May 2019](#)

[South West Water - Sewage Pipelines in Bovisand, Wembury area
May 2019](#)

[South West Water - Pumping of sewage at Wembury
June 2019](#)

[Devon and Severn IFCA - Hand Gathering
July 2019](#)

[Devon and Severn IFCA - Exemptions Byelaw
August 2019](#)

[DEFRA - Highly Protected Marine Areas - Call for Evidence
October 2019](#)

Plymouth City Council - Plymouth Sound National Marine Park Engagement Document
February 2019

Question 1: Do you agree with the concept of designating the first National Marine Park in Plymouth Sound?

Yes, we agree with and support the concept of a National Marine Park.

We comment that the term 'designating' could cause confusion because of other ways the term is used in a strict conservation sense, and because it implies a formal set of rules or regulations that apply following the designation. "Declaring" or "Establishing" might be more appropriate.

Question 2: Do you agree that a National Marine Park should enhance social and economic benefits as well as enhancing the natural environment?

Yes, and it is essential that activities arising from that social and economic benefit are managed in a way that protects the natural features which make the area so special. For example, there should be emphasis on activities that have a low impact on the environment, and those that contribute to greater understanding of it.

In the paragraph above Question 2, we are concerned about the mention of 'species reintroduction efforts' and are not sure to what this refers. We are aware of reintroduction schemes for native oysters in other marine inlets but reintroduction efforts (for whatever species) may be expensive mistakes and, without specific examples, are best not mentioned.

Question 3: What do you think are the environmental benefits of creating a National Marine Park?

We think that enhancing awareness and appreciation of the wonderful marine wildlife and habitats around Plymouth will increase the desire of people to care and look after them. This should lead to real environmental gain. Another benefit could be that emphasising the special nature of the whole area may reduce pressure on particularly vulnerable spots within it such as Wembury.

Question 4: How can a National Marine Park deliver economic benefits to the area?

We hope that increased awareness and appreciation will provide extra employment opportunities in education about the special aspects of the area. It could also enhance the reputation of Plymouth for green investment. There may be increases in visitor numbers and visitor activity and these must be managed in a way that protects the natural environment. Otherwise, the park could be self-defeating.

Question 5: How would communities benefit from the creation of a National Marine Park?

Increased prestige for the area and education opportunities would be real benefits. It would help communities appreciate the beauty and fascination of the natural environment 'on their doorstep'.

Question 6: Do you agree with the vision for the Plymouth Sound National Marine Park?

We agree with the overall vision statement for the Marine Park.

We comment that the description of marine protected areas is muddled and that a simple reference to the presence of several statutory designations for the area(s) and reference to an outline map showing the boundaries of the various relevant designations would be adequate.

Question 7: Do you support the proposed objectives for the Plymouth Sound National Marine Park? Are there any other objectives that you think the National Marine Park should deliver?

Yes, we support the proposed objectives. We would [in Objective 4] add 'maintain and, where appropriate and possible, improve, the natural, cultural and historical features of the area'.

Question 8: Do you agree with the name Plymouth Sound National Marine Park?

The proposed park covers a considerably wider area than Plymouth Sound so this name is not ideal. However, more accurately descriptive names could be less appealing.

Question 9: Do you agree with the proposed initial area for designation and the proposed extension area?

Yes, the proposed initial and extended areas appear reasonable. They reflect the area that is used by most recreational activities that involve going to sea.

Question 10: Do you agree with the proposal to have a fuzzy line to show how far inland the designation reaches?

Yes, we agree with a fuzzy line. We consider there should be also be a focus on water catchment areas and the way activity in catchments can affect the sea. This should be highlighted on relevant maps of the park. It would emphasise everyone's connectivity with the sea and encourage engagement with people not living directly on the coast.

Question 11: Do you agree with the proposed designation timetable?

Yes, the timetable looks reasonable.

Question 12: Do you agree that the designation of the Plymouth Sound National Marine Plymouth should set the framework for a network of National Marine Parks around the country?

Yes, it could be a good proof of the concept and lead to a series of National Marine Parks.

We comment that 'network' can be a good description for communications but can be misleading when applied to protected areas as, in environmental terminology, the term 'network' suggests a level of ecological connectivity which a national series of NMPs would be unlikely to provide.

Devon County Council - Proposal to upgrade Wembury Parish footpath May 2019

I am writing on behalf of the Wembury Marine Conservation Area Advisory Group (which I chair) regarding the proposal to upgrade Wembury Parish Footpath 1 to a Byway. We strongly object to a proposal that would result in vehicles accessing paths around Bovisand and Wembury Beaches, which are in the Marine Conservation Area.

The Area is of national significance for marine wildlife and is enjoyed by people from Plymouth and much further afield who greatly appreciate that wildlife and the tranquility that it needs to thrive.

Vehicle access would greatly increase:

- * Disturbance to wildlife including coastal birds, particularly when nesting and feeding
- * Erosion of paths, leading to siltation of streams
- * Pollution risk to streams and beaches
- * Litter
- * Potential incidents and accidents, particularly with the many children that come to enjoy the beaches and their wildlife

South West Water - Sewage Pipelines in Bovisand, Wembury area May 2019

I'm contacting you on behalf of the Wembury Marine Conservation Area Advisory Group, of which I'm Chair, to express our concern about any work that may increase pollution risk to the sea or beaches within the Conservation Area. This Area runs from Gara Point on the east side of the Yealm to Fort Bovisand. The Conservation Area is of national importance for marine wildlife and is vulnerable to any pollution on or near the coast. As I'm sure you know, Wembury and Bovisand beaches are also extremely popular with the public for recreation and watersports of all kinds.

Our greatest concern is that the developments will increase sewage loading on the Wembury sewage treatment plant. Even without that additional loading, this plant has suffered a from a number of failures causing pollution incidents in the recent past. Could you therefore please provide information on:

- * What improvements are planned for the Wembury sewage treatment plant, to enable it to safely handle the additional loading.
- * How the overall risk of pollution from the Wembury plant is being managed and reduced.

On the pipeline installation itself, as discussed, we ask you to ensure that:

- * The route for any pipeline is selected to minimise the risk of pollution from any breakage, disturbance, damage or leakage of the pipeline affecting beaches or the coast.
- * Materials and methods for installation of the pipeline are chosen to minimise the risk of such pollution during its installation and operation.

You said you would emphasise the environmental sensitivities of the area with the relevant managers in South West Water and with your contractors. Could you please confirm that this has been done?

South West Water - Pumping of sewage at Wembury June 2019

(The following are edited extracts from a series of emails between Paul Naylor and SW Water)

I have heard that work is to be carried out at the Wembury sewage pumping station in the coming week that will involve 'overpumping' of sewage.

I'm not sure what this process involves, could you please explain? Given the importance and vulnerability of the Wembury coastal habitats that were referenced in the previous mail (see above), could you also please provide information on:

- * Measures being taken to prevent sewage leaking into the stream or reaching the beach during the work?
- * Measures being taken to minimise the impact of any accidental leakage? I understand the plan is to do the work overnight, to minimise disturbance, but that may well coincide with low tide next week. Presumably the impact of any pollution on the beach would be greater at low tide.

Kier replaced some valves in the pumping station at Wembury, which is located behind the public conveniences. This means that if there is any problem with the assets in the future which may result in a spillage, the correct asset can be easily located and isolated. This is very important because Wembury is a vulnerable coastal habitat and needs to be protected from spillages.

They overpumped sewage overnight (pumped into waiting tankers for transfer to the treatment station, so enabling the maintenance work to be carried out). Every effort was made to ensure that there was no leakage, but in the unlikely event that there was any leakage, spill kits were carried and would have been used.

The work coincided with low tide and every precaution was taken to protect the beach and wildlife.

Devon and Severn IFCA - Hand Gathering July 2019

I am responding to your consultation on hand gathering on behalf of the Wembury Marine Conservation Area Advisory Group (WAG) of which I am chair.

We would like to make the following points.

* The Wembury Marine Conservation Area Advisory Group (WAG) has been very concerned for some time about the potential impact of hand gathering on shore wildlife and ecology, particularly at a location like Wembury.

* There are occasional reports of groups gathering large numbers of animals such as limpets and winkles locally, and we worry that this could intensify or diversify at any time.

* Wembury receives a lot of human pressure yet is a very special place for wildlife which people rely on for enjoyment, learning and science. It must continue to be a sanctuary for that wildlife. At the same time, Wembury is very vulnerable to hand gathering because of easy access, including for large vehicles close to the beach.

* We would therefore welcome restrictions on hand gathering at Wembury (and other vulnerable locations), with any collection requiring a permit and/or strict limits on quantities.

* We note that spearfishing is one of the listed activities and would be pleased to see it included. The use of Wembury for spearfishing is a long-running worry for us; it contradicts the perception of an MCA as somewhere people go to watch and enjoy wildlife. We are also concerned that spearfishing activity appears to be intensifying in the Wembury area.

* Another concern is that unregulated collection of shore crabs as bait could threaten this species that is so important to intertidal ecology. Shore crabs may also be an essential bulwark against invasive crab species.

* We note the statement in your call for information that 'Good quality information from you can reduce the need for D&S IFCA to be overly precautionary in its approach to managing this and other fishing activities.' While we appreciate that this aims to encourage transparency, we would actively encourage a precautionary approach to management as a sound environmental principle.

Devon and Severn IFCA - Exemptions Byelaw August 2019

I am responding to your consultation on the Exemptions Byelaw on behalf of the Wembury Marine Conservation Area Advisory Group (WAG) of which I am chair.

We would like to make the following points:

- * We understand the need for the flexibility and practicality that the byelaw would introduce, by enabling the gathering of evidence for assessing impacts on relevant species and habitats to support their conservation.
- * We would like to see transparency whereby information on exemptions was available (perhaps via web-site) and relevant stakeholders were consulted on or at least informed of exemptions being issued that affected areas about which they were concerned. An example would be where our group (WAG) were consulted on exemptions affecting the Wembury Marine Conservation Area.
- * We suggest that data generated as a result of an exemption is made publicly available and is archived in a suitable data centre such as DASSH (the UK archive for marine species and habitats data). This would again support transparency in the exemption system, given it is designed to enable the generation of such data. We also welcome any mechanism that encourages sharing and availability of scientific information.

**DEFRA - Highly Protected Marine Areas - Call for Evidence
October 2019**

Introduction

What is your name? Dr Paul Naylor

What is your email address? paul@marinephoto.co.uk

1 Would you like your response to be confidential?

No

2 Are you responding to this call for evidence on behalf of an organisation or as an individual?

on behalf of an organisation

2a If responding on behalf of an organisation:

Which organisation(s) are you responding on behalf of? :

Wembury Marine Conservation Area Advisory Group

What is the position you hold at the organisation(s)?:

Chairman

2c If employed or retired, briefly describe the main business activity of your company /organisation? :

The Wembury Marine Conservation Area Advisory Group promotes and supports the conservation and study of the Wembury Marine Conservation Area.

3 How old are you?

55-64

4 What is your gender?

Male

5 Which region of the UK do you live in?

South West

6 Which of the following best describes where you live? .

Rural – coastal

Part 1: HPMAs aims, opportunities and challenges

7 To what extent do you agree with the following reasons for introducing HPMAs?

To provide marine areas a chance to return to as natural a state as possible:

Strongly agree

To provide a reliable measure of what recovery could look like if all damaging human activities were removed:

Strongly agree

To act as no take zones, allowing commercially fished species to recover and for these benefits to spill outside of the protected area:

Strongly agree

To better protect sensitive and/ or ecologically important species and habitats:

Strongly agree

To look after our seas as part of our duty as stewards of the natural environment:

Strongly agree

To better prevent or lessen the effects of climate change, for example to protect habitats that can capture carbon or protect species that are vulnerable to a warming ocean:

Agree

To preserve and increase opportunities for nature-based tourism:

Agree

To support or improve opportunities for cultural, spiritual, educational and/or recreational activities:

Slightly agree

8 The UK already has a network of MPAs that includes Marine Conservation Zones (MCZs). How could HPMA complement and enhance the current designations in English inshore and offshore waters and Northern Irish offshore waters?

Current MPAs continue to allow a range of activities that can remove and damage marine organisms. It is essential that some, if not all, of these areas provide proper protection to marine life by becoming 'no take' zones to allow full recovery of the ecosystems, provide an indication of the impact of human activities and allow 'spill-over' of recovery into non-protected areas.

9 Do you have any experience or examples relevant to the UK where you believe HPMA or similar have been effective or ineffective?

Please provide any relevant evidence.

The UK 'no-take' areas at Lundy and Lamlash Bay (Arran) show benefits very clearly although they are both extremely small areas. There is also overseas experience from countries such as USA and New Zealand that show great benefits from fully protected/'no-take' areas.

10 Do you see any challenges to the introduction of HPMA? If so, how could these challenges be addressed? Please provide any relevant evidence.

Those with a commercial interest in removing marine organisms from HPMA may often challenge their introduction. Such challenges should be countered by the argument that long-term sustainability of those commercial interests can only be maintained in a healthy marine environment where significant areas are properly protected.

11 What is your opinion of the evidence for HPMA? Where is more evidence required?

The evidence for the benefit of HPMA is very strong but this question is the wrong way round! We should be following the precautionary principle in nature conservation. Protected Areas should, in general, be highly protected with potentially damaging activities only allowed where there is good evidence that this is sustainable.

A conclusion of the 2004 Royal Commission report on UK fisheries, 'Turning the Tide', was:

'We already have numerous policies for protecting the sea. However, it is clear that many of the current conservation measures are operating on a tiny scale. The degree of protection is often weak, with fishing continuing unabated even in areas of international conservation importance. High standards of proof are needed to identify sites and the need for action to prevent damage. This is inconsistent with our view that a precautionary approach should be taken to protect the marine environment.'

Part 2: HPMA site selection

12 What evidence and factors should be considered when selecting sites for HPMA and who should be engaged in the process?

Scientific evidence on the distribution and density of marine species, and on the distribution of relevant biotopes should be used to select HPMA sites. Factors should include selection of sensitive biotopes that would benefit from full protection, presence of commercially important species that would benefit from recovery and provide a spill-over effect, and locations that would provide valuable information on habitat recovery. Commercial interests should be engaged at an early stage but the selection must be led by sound ecological science and not be a 'cobbled together' compromise between conservation interests and commercial lobbying with the result being a few areas selected on the basis that they are undesirable or impractical for commercial fishing.

13 Are there any locations where it would be particularly beneficial: (i) for a location to become an HPMA or (ii) an existing or part of an existing MPA to become an HPMA? Please could you state these in the box below and provide any relevant evidence.

All MPAs should be considered as possible candidates for HPMA status, using a precautionary approach. The presumption should be that all MPAs merit HPMA status unless it is clear that the activities allowed in them do not reduce or negate their value.

It is essential that this precautionary approach is adopted. The 2004 Royal Commission report stated that: 'We recognise that there is a considerable degree of scientific uncertainty in our understanding of marine ecosystems. Our report recommends changes in the emphasis of research away from management of fish populations towards a wider focus on the marine environment. Although more work needs to be done to improve our understanding of the marine Environment, it is clear that significant damage is being done now. We cannot wait for the results of the research. We need to adopt a precautionary approach and not use scientific uncertainty as a reason for delay.' [the last sentence was bold in report]

Wembury Bay would be an excellent site for an HPMA, given the background information that is available to enable the charting of recovery, its use for scientific research and education, its reputation for nature conservation and its use for nature-based recreation.

Part 3: Future implementation and management of HPMA's

14 What would be the most appropriate way of managing and monitoring HPMA's? How do you think this could fit alongside existing marine management?

We are not sure of the most appropriate management mechanism, whether it be by the MMO or IFCA's for example, but there must be sufficient resources allocated so the HPMA's are robust, sustainable and do not fall into disrepute. We are sure there is a way of using GPS tracking technology linked to commercial fishing permissions to achieve this successfully.

Part 4: Your past experience of the Marine Protected Areas (MPA) identification, designation, and management process

15 Have you been involved in the identification, designation or management of MPAs in the UK previously?

Yes

15a If yes, we would like to learn from your experience of being involved in MPA identification, designation and management. Please could you provide information on:

The name of the MPA(s) and your role and involvement:

Some of our Group has had involvement, in the Finding Sanctuary process for example.

What worked well?:

What could be improved?:

Little specific information available but the overall impression was that MPA selection was too often influenced by commercial interests rather than sound biological science, with sub-optimal compromises sometimes being the result.

16 How has stakeholder and local knowledge been included in previous processes to introduce MPAs (inshore or offshore)? Please can you comment on whether and how this knowledge can better be integrated in future processes associated with HPMAs?

More emphasis should be placed on biological information and on taking a precautionary approach where there is inevitable uncertainty. It should be recognized that some stakeholders will be unhappy with HPMAs proposals in the short-term but that HPMAs are essential for the long-term health of our seas and the industries that depend on them. It is not a matter of ignoring stakeholders with opposing views but considering how HPMAs will be monitored and reviewed, and how these results will be shared, at an early stage to find out how the stakeholders' concerns can be addressed.

Part 5: Any other comments

17 Are there any other comments you would like to make in regard to HPMAs?

We would like to emphasise the importance of a precautionary approach, where the assumption is against fishing activity in protected areas.

A recommendation of the 2004 Royal Commission report was that:

'The UK Government should develop selection criteria for establishing a network of marine protected areas so that, within the next five years, a large-scale, ecologically coherent network of marine protected areas is implemented within the UK. This should lead to 30% of the UK's exclusive economic zone being established as no-take reserves closed to commercial fishing'