



Formal Consultation Report - Mobile Fishing Permit Conditions

A Summary of Responses from the Formal Public Consultation

(9th January 2025 to 2nd February 2025)

12th February 2025

Contents

1. Foreword - This Report & its Purpose	3
2. Executive Summary of the Formal Public Consultation	3
3. Communication & Outreach	4
3.1 How D&S IFCA Conducted the Formal Public Consultation	4
3.2 The Circulated and Advertised Information	5
4. The Response to the Formal Public Consultation	9
4.1 Support for the Proposal	9
4.2 Objections to the Proposal	9
Natural England	9
Devon Wildlife Trust	10
Wembury Marine Conservation Area Advisory Group (WAG)	12
Individual Stakeholders	13

Version Control

Version & Date	Comments
Version 0.1 – 4 th Feb 2025	1 st draft of report prepared. Internal review, additions, and editing.
Version 1.0 – 12 th February 2025	Report finalised for presentation to the Byelaw & Permitting Sub-Committee for use at their meeting on 27 th February 2025.

1. Foreword - This Report & its Purpose

This report (12th February 2025) has been prepared for Members of the Devon and Severn Inshore Fisheries and Conservation Authority's (D&S IFCA's) Byelaw and Permitting Sub-Committee (B&PSC) and for all stakeholders to examine via its publication on the D&S IFCA website.

This report is part of a package of information presented to the B&PSC. This report is not intended to provide the B&PSC with additional information relating to the proposal. The accompanying Officers' paper provides a response to the main points raised by stakeholders and includes the recommendation to the B&PSC, regarding potential changes to the Category One Mobile Fishing Permit Conditions.

This report demonstrates how the formal public consultation - *Amendments to Commercial (Category One) Mobile Fishing Permit Conditions* - was conducted. This report documents the written responses received in the public formal consultation to demonstrate the views of those that responded. This report includes extracts from each response that are set out in *purple font*. Every response¹ submitted in writing was acknowledged by officers who also provided additional information in email replies.

2. Executive Summary of the Formal Public Consultation

As a percentage of those notified, there was a low response to the formal public consultation. **seven** written responses were received by the closing date of midnight 2nd February 2025 and all written responses objected to the proposal. All seven objection letters indicated awareness of the Formal Public Consultation was as a result of direct notification from D&S IFCA.

The Formal Public Consultation was not a questionnaire or an attempt to gauge stakeholder popularity regarding the proposal. There were no written responses received that supported the proposal; however, the primary aim of the Formal Public Consultation was to provide an opportunity for stakeholders to object to the proposal, to document the reasons why, and to then present this information to the B&PSC. Objections were received from **three** organisations and **four** individual stakeholders, with the full content of the responses set out in Section 4 of this report.

The organisations that responded were Natural England (NE), Devon Wildlife Trust (DWT), and Wembury Marine Conservation Area Advisory Group (WAG). All three organisations raised concern regarding damaging interaction between mobile fishing activity and the features of the Marine Protected Area - the Skerries Bank and Surrounds Marine Conservation Zone. DWT set out that the re-opening would undermine conservation objectives and would contradict the purpose of MPAs.

Both NE and DWT highlighted a revised condition assessment (October 2023) undertaken by NE. Both organisations commented that the condition of the features (subtidal coarse sediment and moderate energy circalittoral rock) has changed from "maintain" to "recover". NE have indicated that the closure during 2023 and an on-going closure will be beneficial with a view to "recovery". It is the view of WAG that all demersal mobile fishing activity should be prohibited from all Marine Protected Areas. The organisations do not accept that a one-month

¹ Received by D&S IFCA by the closing date of 2nd February 2025.

opening will have no adverse effects. WAG urged that a precautionary approach be taken to enable recovery of features.

The individual stakeholders that responded all had an interest in recreational angling, as well as a wider interest in the marine environment. These objections were based around impacts of mobile fishing within a Marine Protected Area, impacts on fishing populations, and that the re-opening would negatively affect rod-and-line anglers who fish in close proximity to the area (Skerries bank) and contribute significantly to the local economy, in particular Dartmouth.

3. Communication & Outreach

3.1 How D&S IFCA Conducted the Formal Public Consultation

The Formal Public Consultation began on 9th January 2025 and ended at midnight on 2nd February 2025.

Officers set out the proposal, and related information, in a word and pdf document that formed the basis for direct circulation and for posting on the D&S IFCA's website and Facebook.



Direct Communications

The information for the Formal Public Consultation was transcribed into Mailchimp format. This is D&S IFCA's preferred method for directly communicating Formal Public Consultations.

All Permit holders were directly notified of the Formal Public Consultation using either Mailchimp, email (with attachment) or by having hard copy information sent in the post.

Some permit holders have unsubscribed from Mailchimp, and were therefore sent the information in standard email (as an attachment). There are **37** permit holders that have not provided D&S IFCA with a functioning email address and were therefore sent hard copy information, with postal costs amounting to £31.45. The Mailchimp was circulated to **1,834** contacts and it was opened by **1,031** recipients.

The information was directly circulated to all B&PSC Members as an email attachment on 9th January 2025. This was to potentially aid Members raise further awareness, or to enable Members to potentially reach additional contacts that may not have been notified using D&S IFCA's communication databases.

The D&S IFCA Website & Facebook

Throughout the Formal Public Consultation period, the [Active Consultations/Events](#) – page displayed the information in full. In addition, a D&S IFCA [News Item](#) was produced for display on the home page news scroll and the Latest News Tab and duplicated on Facebook.



3.2 The Circulated and Advertised Information

The following is a transcript of the information produced for the Formal Public Consultation.

What is this about?

D&S IFCA is inviting you to respond to the formal public consultation on a proposed amendment to current commercial (Category One) Mobile Fishing Permit Byelaw Permit Conditions. To amend the Permit Conditions, D&S IFCA must follow a process that includes formal public consultation.

D&S IFCA is directly contacting everyone on its (email) mailing list to set out the proposed change to the Permit Conditions, the reasons for the proposed change, and how you can respond. D&S IFCA is also writing to permit holders that have not provided an email address. Your view is important, and D&S IFCA encourages you to forward this information or to notify others that may have an interest in the formal public consultation.

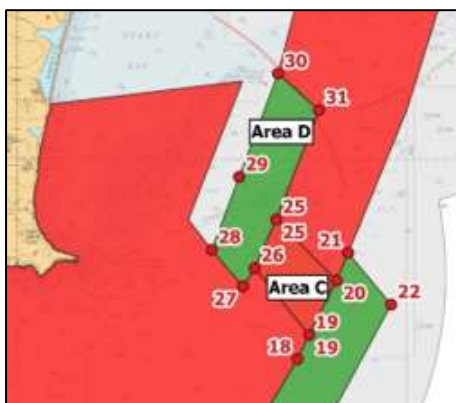
Information is available on the D&S IFCA's website to support this formal public consultation. The formal public consultation begins on **9th January 2025** and will end at midnight on **2nd February 2025**. The information prepared for the formal consultation includes a privacy notice relating to the protection of personal information.

The Proposed Change

The proposed change to the Permit Conditions relates to access (a re-opening of an area) for demersal mobile fishing gear in part of South Devon, east of Start Point. The area is marked as Area C in the chart below. This area is also known as "the Corridor."

The Area - Part of Annex 5a

Annex 5a sets out access areas for vessels using demersal mobile fishing gear in accordance with Paragraphs 3.5 and 4.4 of the Mobile Fishing Permit Byelaw Category One Permit Conditions.



Currently Area C (within points 19, 20, 25, and 26) is not accessible for demersal mobile fishing and is coloured red in Annex 5a.

It is proposed that Area C will be re-opened to allow access for demersal mobile fishing gear 1st March to 31st March and Annex 5a will be amended to show Area C as a green access area.

Paragraph 4.4 in the Permit Conditions includes a table of dates and the table of dates will be amended to show that Area C will be open from 1st March to 31st March.

Paragraph 3.5 in the Permit Conditions will not require amendment.

The current Annexes, including Annex 5a, can be viewed on D&S IFCA's website: <https://www.devonandsevernifca.gov.uk/wp-content/uploads/2024/12/Mobile-Fishing-Cat-One-Permit-Annexes-Dec-2024.pdf>

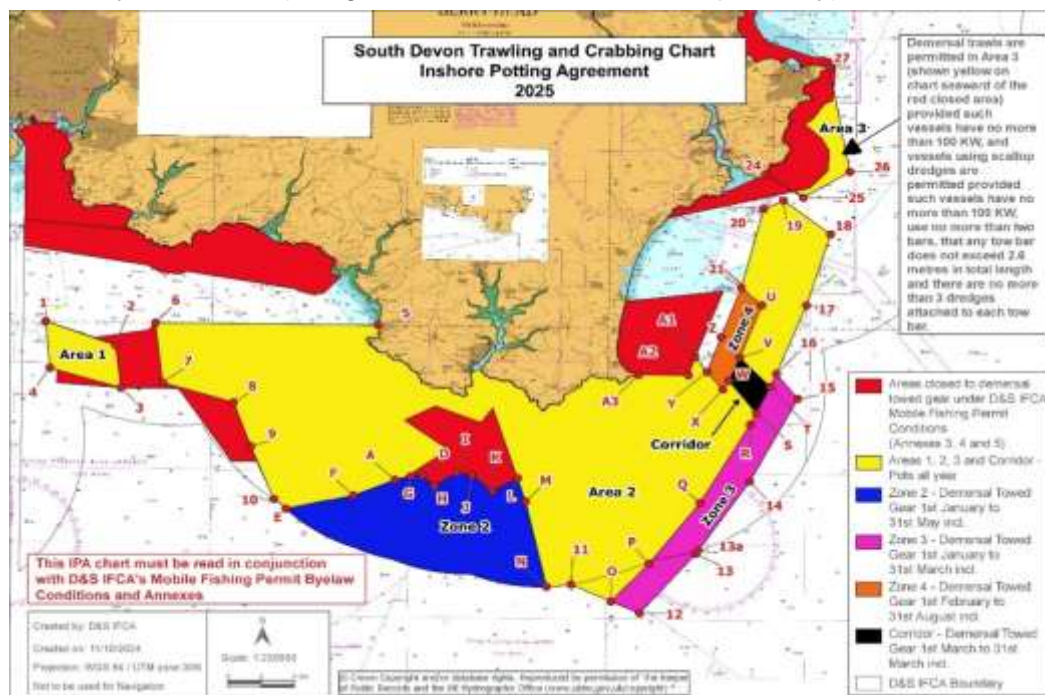
What is the Purpose of the Change?

Mobile fishing is managed through local and national legislation, and although local legislation (Byelaws and Permit Conditions) can be more restrictive than national legislation, this is not always appropriate to achieve particular objectives. Implementation of the proposal will result in an alignment of local and national legislation. Background information and the rationale for the proposal is set out below.

Background Information and Rationale for the Proposed Change

In addition to D&S IFCA's Mobile Fishing Permit Conditions, access for mobile fishing (that includes trawling and scallop dredging) in parts of South Devon is regulated by national legislation through a licence condition. A chart, called the South Devon Trawling and Potting Chart, and also known as the IPA Chart, is produced and should be read in conjunction with the licence condition.

The IPA Chart overlaps with D&S IFCA's Mobile Fishing Permit Conditions (Annexes). Two designated MPAs, the Skerries Bank and Surrounds MCZ and Start Point to Plymouth Sound and Eddystone SAC (designated in 2013 and 2011 respectively) co-locate with the IPA.



The IPA Committee

The areas in the IPA Chart are discussed each year by the IPA Committee which normally consists of five members of the commercial potting fleet and five members of the mobile fishing (trawling and scalloping) fleet that actively fish within the IPA or are representatives of those that do. The Marine Management Organisation (MMO) and D&S IFCA facilitate and chair the meeting.

In 2023, the IPA Committee reacted to reported infringements within the Corridor, and determined that the Corridor should be closed during March 2024 and the 2024 IPA Chart prohibited access within the Corridor. The IPA Committee agreed to consider the re-opening of the Corridor if there were no infringements recorded in 2024. The closure, with the potential

for a re-opening was the IPA Committee's commitment to encourage compliance with the spatial management.

In 2024, D&S IFCA were required to amend its Category Mobile Fishing Permit Conditions to also close the Corridor (Area C of Annex 5a of the Mobile Fishing Permit Annexes) as D&S IFCA's permit conditions cannot be less restrictive than national legislation.

At the IPA Committee in September 2024, the re-opening of the Corridor for 2025 was discussed. In a vote, Members of the IPA Committee unanimously agreed to the opening of the Corridor between 1st March and 31st March 2025.

Decisions taken by the IPA Committee are not bound by the legal duties placed on D&S IFCA. This decision by the IPA Committee is reflected in the IPA Licence Condition, which applies from 1st January 2025. The 2025 IPA Chart has been circulated to fishers. Minutes of IPA meetings can be found on D&S IFCA's website; on the South Devon IPA Display Page:

<https://www.devonandsevernifca.gov.uk/enforcement-and-legislation/south-devon-ipa-trawling-crabbing-chart/>

D&S IFCA's Byelaw and Permitting Sub-Committee (B&PSC)

D&S IFCA's Byelaw and Permitting Sub-Committee (B&PSC) has the responsibility of reviewing the management of fishing activities within D&S IFCA's District. The B&PSC reviews and develops D&S IFCA's byelaws and permit conditions. The role of the B&PSC includes considering changes to permit conditions. A list of B&PSC Members can be found on D&S IFCA's website or by clicking [here](#).

Due to the amendment to the 2025 IPA chart, the management measures set out in the Licence Conditions and D&S IFCA's Category One Mobile Fishing Permit Conditions do not align, with D&S IFCA's management measures now more restrictive than the Licence Conditions. On 5th December 2024, the B&PSC discussed the differences in management measures and the B&PSC were aware that D&S IFCA is not legally required to align the management measures; however, the B&PSC supports and encourages the continuation of co-management within the IPA areas.

The B&PSC have accepted that the default position is that the Corridor and adjacent areas should be accessible for demersal mobile fishing vessels during limited time periods each year. The opening enables D&S IFCA to balance the needs of the fishing sector and its own conservation duties. D&S IFCA officers have undertaken the necessary environmental assessment of mobile fishing activity within the Corridor based on this limited access window each year, and concluded that the activity would not have an adverse effect. The B&PSC have accepted this as their position and are satisfied that the proposed change does not conflict with its statutory duties (S153 and S154) Marine and Coastal Access Act 2009.

On 5th December 2024, the B&PSC voted and agreed that formal consultation should be undertaken with a view to align the Category One Mobile Fishing Permit Conditions with the 2025 Inshore Potting Agreement (IPA) Licence Condition.

Your Response

1. If you wish to object to the proposed change, please explain the reasons for your view.
2. Responses sent by email or letters are preferred, however you can also telephone us or meet with us in person if you prefer.
3. It is important that every response contains the following information:

- Your name and contact details (if not already on our mailing list).
- Why you (or the organisation you represent) have an interest in this consultation?
- Are you a D&S IFCA permit holder and if so, what D&S IFCA permit do you hold?
- How were you made aware of this formal public consultation? (e.g., by this circular, by browsing D&S IFCA's website, D&S IFCA Facebook, from someone else, or other source).

4. Sending in your response/contacting us

Different options are available:

1. Contact us via email – consultation@devonandsevernifca.gov.uk
2. Write to us: D&S IFCA, Brixham Laboratory, Freshwater Quarry, Brixham, TQ5 8BA.
3. Call us to find out more about the formal consultation – 01803 854648 (Extension 856)
4. Your response must be received by midnight on 2nd February 2025.

The Next Steps

When the formal consultation ends, all the responses will be collated. The responses will be analysed by D&S IFCA Officers and anonymised (where appropriate) to create a report that will be presented to D&S IFCA's B&PSC in February 2025. If the B&PSC decide to go ahead with the changes to the Category One Mobile Fishing Permit Conditions, amendments will be made as highlighted in this formal consultation. The amended Category One Mobile Fishing Permit Conditions and Annexes will be reissued to permit holders free of charge before 1st March 2025.

What do we do with your information – Privacy Policy

We protect any personal data that you may provide. Any personal data submitted in this information collecting process will not be shared with other organisations or placed in the public domain. The content of responses will be summarised and anonymised where appropriate for documenting in reports that will be presented to the Byelaw & Permitting Sub-Committee and published on our website.

D&S IFCA has a privacy policy which can be found by visiting our website (home page) www.devonandsevernifca.gov.uk

- You can change your preferences at any time.
- We have a duty to consult with D&S IFCA Permit Holders.
- You can manage your preferences by contacting D&S IFCA.

Background Reports & Papers (Links) and keeping you informed.

Reports and Officers' papers of most significance to any review or change to byelaws or permit conditions are available on D&S IFCA's website:

- [The Authority and B&PSC Meetings Page](#)
- [B&PSC Papers & Meeting Minutes: Section B of the D&S IFCA Website Resource Library](#)

- [MCZ Assessments \(Tranche 1\): Section H of the D&S IFCA Resource Library](#)

We post information about our work on our website/Facebook. Direct communication is often the best way to help you stay informed about our work and to highlight the opportunities for you to have your say on a range of topics or issues. If you are not already on our mailing list, then you can get yourself added by contacting D&S IFCA and you will then be directly notified of all our formal consultations.

End.

4. The Response to the Formal Public Consultation

4.1 Support for the Proposal

No written responses were submitted supporting the proposal.

4.2 Objections to the Proposal

All seven objections were as a result of direct communications. Three responses were submitted by organisations; Natural England, Devon Wildlife Trust and Wembury Marine Conservation Area Advisory Group (WAG). The relevant content of these objections is transcribed below:

Natural England

Natural England (NE) and the Devon and Severn Inshore Fisheries and Conservation Authorities (D&S IFCA) share a common goal of sustainable management of a healthy marine environment. Natural England recognises that the IFCA also has a specific commitment to secure the balance of environmental concerns with the needs of sustainable fishing. We acknowledge the longstanding agreement between the IFCA and the Inshore Potting Agreement (IPA), with the closure—and potential for re-opening of the Corridor—reflecting the IPA Committee’s commitment to encouraging compliance with spatial management. While we commend the IPA as an example of effective co-management, we feel it is useful to respond to this Formal Public Consultation to reiterate Natural England’ position regarding the protection and management of the Skerries Bank and Surrounds Marine Conservation Zone (MCZ).

In 2021, a Marine Conservation Zone (MCZ) Assessment for towed gear operating within the site was undertaken by the IFCA and concluded no risk that the activities assessed could hinder the achievement of the conservation objectives of the site. NE did not agree with the overall conclusion that demersal gear is unlikely to have a significant impact on the moderate energy circalittoral rock feature, or that the general management approach of “maintain in favourable condition” for subtidal coarse sediment will be met with current activity levels, and that the activity will not hinder the conservation objective target for these features and their attributes. Evidence from studies, such as Blyth et al. (2004), suggested that current levels of fishing activity, particularly within seasonally open areas within the IPA, may influence the faunal composition of the site, making these areas more similar to permanently open zones than to permanently closed zones. It was however, agreed by the IFCA’s byelaw and permitting subcommittee (B&PSC) in October 2021 that no changes to management were necessary.

Condition assessments are carried out for all MPAs to provide information on the condition of marine features for statutory reporting obligations. The results can also help support our

statutory advice to regulators and help us to direct management efforts to where they are most needed. In July 2023, a marine condition assessment of Skerries Bank and Surrounds MCZ was published, assessing the condition of subtidal coarse sediment in the site as “unfavourable - declining”. The area of coverage of Subtidal coarse sediment at this site was considered minimal at the time of designation, leading to a vulnerability assessment that suggested little risk to the feature from fishing (little overlap), hence a ‘Maintain’ General Management Approach (GMA) was proposed for the feature at the point of site designation. However, a later verification survey revealed the feature was more widespread than previously thought, therefore the overlap with bottom towed gear is also more significant than at first suspected. In addition, evidence suggests that the current levels of towed gear fishing activity over the subtidal coarse sediment feature are likely to be preventing the feature from achieving favourable condition. Recolonisation following impacts from bottom towed gear may occur for opportunistic species, but full biomass recovery of species associated with key biotopes identified at the site, is unlikely in areas targeted by demersal gear. Studies suggest a minimum recovery period of two years for these communities (Tillin and Tyler-Walters, 2023). The findings of Blyth et al. (2004) reinforced the concerns regarding potential fishing impacts on the subtidal coarse sediment. As such, in the 2023 assessment the condition of subtidal coarse sediment was assessed as 'Unfavourable - Declining' and the GMA was changed from "Maintain in favourable condition" to "Recover to favourable condition" based on the best available evidence. We are aware that the IFCA has raised concerns regarding the conclusion that fishing activities are hindering the achievement of the conservation objectives for subtidal coarse sediment.

In conclusion, there are still differing views regarding the management of the Skerries Bank and Surrounds MCZ, particularly with regards to the subtidal coarse sediment feature. This feature is now in recover (a change that has occurred since the Corridor area was closed in September 2023), and in this context we would not support the opening of previously closed areas of the IPA. We disagree that demersal gear has no significant impact on the subtidal coarse sediment and moderate energy circalittoral rock features within the site. We therefore advise that expected levels of fishing with demersal gear within the portion of the site known as ‘the corridor’ may hinder achieving the conservation objectives with a recover target, if this area were to reopen. However, despite our differing views we are committed to continuing the dialogue with the IFCA to ensure that the agreed management approach is based on the best available evidence and leads to suitable ecological outcomes.

Devon Wildlife Trust

We object to the proposal based on the following points:

Ensuring effective protection of MPAs

MPAs are established to protect sensitive habitats and species, many of which are highly vulnerable to disturbance from bottom-towed gear (BTG). However, current management approaches, which allow fragmented spatial access and seasonal openings, weaken their ability to deliver meaningful conservation outcomes. To ensure MPAs function as intended, we urge D&S IFCA to adopt the following principles:

- BTG must be fully prohibited in all MPAs – Allowing any level of BTG activity undermines conservation objectives and contradicts the purpose of MPAs. Scientific evidence consistently demonstrates that BTG causes significant damage to benthic habitats, reducing biodiversity and altering ecosystem function.

- MPA boundaries must be simplified – The increasing use of zonation and cut-outs leads to fragmented protection and greater enforcement difficulties. Complex spatial closures create isolated pockets of protected habitat, rather than cohesive ecological networks, reducing the effectiveness of site-based conservation.
- Management must prioritise whole-site recovery – Piecemeal management undermines efforts to restore degraded seabed habitats. Instead of revising boundaries to accommodate short-term industry interests, focus should be placed on strengthening protection and ensuring long-term resilience.

The proposed reopening of Area C to demersal mobile fishing gear is inconsistent with the principles above and poses a direct threat to conservation efforts within this MPA.

Updated Conservation Advice for the Skerries Bank and Surrounds MCZ

Under Section 154 of the Marine and Coastal Access Act 2009, IFCA's are required to take necessary steps to further the conservation objectives of MCZs. In the latest condition assessment (October 2023) of the Skerries Bank and Surrounds MCZ, the conservation advice for subtidal coarse sediment and moderate energy circalittoral rock - both of which are present in the Corridor based on the data presented on the MAGIC map - was updated from "maintain" to "recover" under the attribute "Distribution: presence and spatial distribution of biological communities." Allowing bottom-towed gear in this area directly contradicts this updated advice and would impede progress towards achieving the conservation objectives for these features.

High intensity and limited recovery window

We do not agree that reopening Area C for one month a year would have no adverse impact, as even short-term BTG activity could lead to lasting habitat degradation.

In the MMO's report 'Stage 3 Fishing Gear MPA Impacts Evidence: Bottom Towed Gear', section 8.2.2 'Recovery – rate of recovery' states:

'Clean sand communities are likely to recover from disturbance most quickly (Collie et al., 2000), whereas communities from gravel (subtidal coarse sediment) and muddy sand habitats tend to have the slowest physical and biological recovery rates (Dernie et al., 2003; Kaiser et al., 2006; Foden et al., 2010). When considered in terms of MCZ subtidal sediment habitats, muddy sand and clean sand habitats would both fall under the subtidal sand classification, which highlights the complexity of understanding the impacts of fishing on sedimentary habitats. Little evidence is available regarding the sensitivity and recovery of subtidal mixed sediments, but in general terms, the more physically stable habitats are—such as subtidal mud and coarse sediments like gravel—the longer recovery is likely to take (Collie et al., 2000).'

Complexity of monitoring and enforcement

We recognise that D&S IFCA is already working under significant resource constraints, which makes monitoring and enforcement particularly challenging. The increasing number of cut-outs and seasonal variations only add to these difficulties, making enforcement more complicated for the IFCA but also hinder other agencies and stakeholders from effectively reporting issues and supporting enforcement efforts.

Representation within the IPA Committee

It is our understanding that the IPA Committee is primarily composed of fishing industry representatives and while we acknowledge that the IPA has contributed to some improvements in management of the area, MPA decision-making should not be driven by a single sector. If the IPA is to continue influencing D&S IFCA policy, we encourage the inclusion of conservation organisations and independent scientific expertise to ensure balanced decision-making. This would help ensure that the management of MPAs reflects the needs of both the marine environment and the industries that depend on it.

In conclusion, DWT strongly objects to the proposed amendment to the Permit Conditions. Reopening Area C to demersal mobile fishing undermines the protection of sensitive habitats within the MCZ and we urge the Devon and Severn IFCA to prioritise the long-term recovery and resilience of marine ecosystems over short-term fishing access.

Wembury Marine Conservation Area Advisory Group (WAG)

The Chairman of WAG set out that the organisation has wider interests in conservation and the marine environment. Whilst acknowledging that the proposal does not appear to affect the Wembury MCA directly, WAG raised the following points:

- We object to the re-opening of Area C to allow access for demersal mobile fishing gear.
- This is because we consider it essential that the use of demersal mobile fishing gear is banned from all Marine Protected Areas and Marine Conservation Zones intended to protect seabed habitats.
- The gear inevitably damages and removes important components of the ecosystem.
- We do not accept that opening the Area for one month a year will have no adverse effects. The damage done by towed gear in that month will persist and any subsequent recovery of seabed biota in the following 11 months will then be wiped out the next time the Area is reopened. The tendency for fishing activity to concentrate on temporarily opened areas will exacerbate this effect.
- It is imperative that Marine Protected Areas and Marine Conservation Zones fully protect seabed habitats and biota from demersal mobile fishing gear to allow them to recover and thrive.
- This recovery must be enabled and encouraged before further damage is done, and must be managed on a precautionary basis.
- Such recovery will benefit the wildlife itself, the wider environment, recreational users, the fight against climate change AND the long-term interests of the commercial fishing industry.

Individual Stakeholders

01: Recreational angler and diver (with a D&S IFCA diving permit), and fisheries scientist.

I do not believe that IFCA should move to reopen Area C, referred to as "the corridor," to allow the operation of mobile gear types. I understand that while this area may not be of significant importance to pot fishers, given that the charts don't indicate any reef structure for lobsters, and the period in which the area would be open to mobile gears (March) is not a typical working month for brown crab fishers, reopening access could set a concerning precedent. This could undermine efforts to enhance the productivity & recovery our inshore coastal waters.

While well-managed mobile gear fisheries do have a role in UK fisheries, its footprint—particularly within the 6-nautical-mile boundary of our coast—should be minimized to help aid the recovery of these highly productive areas. These areas typically have higher levels of floral benthic growth and a greater diversity of habitat types in a given unit area. Limitations on mobile gear is especially important in areas around ports like Dartmouth and Salcombe, where fleets primarily favour passive gears like potting & static nets that rely on intact, productive habitats. These habitats tend to be degraded when worked by mobile gear, particularly dredges and traditional chain belly beam trawls.

Although reopening this area may benefit operators from further afield, such as fleets out of Brixham, where mobile gear vessels dominate, it is not necessarily in the best interest of those operating closer to the site, as mentioned above.

I am fully aware that the sandy ground in Area C, being so close to the race of start point, will naturally experience a high rate of natural benthic disturbance. However, it is still crucial to protect such areas due to the vital role that inshore grounds play as nursery habitats for commercially important species—many of which the recent FMPs

indicate are very susceptible to juvenile disturbances with a greater knowledge being need to aid recruitment for later harvest.

Additionally, the Skerries is critically important for recreational fishers. While I do not personally fish for skate or flatfish species, reopening this corridor—where I presume there would be a significant take of species like turbot, brill, plaice, skates, and other mixed demersal species—could negatively affect rod-and-line anglers who fish in close proximity to this ground, notably just east and atop the Skerries bank. These anglers contribute significantly to the likes of Dartmouth's economy.

In conclusion, I do not believe reopening Area C would be in the best interest of the majority of vessels operating out of the two most sizable local ports (Salcombe and Dartmouth), or those beach-launched vessels from Beesands, which are typically rod-and-line or passive gear commercial vessel too. This added extraction by relatively unselective mobile gears would not only be felt by commercial fishers but also by recreational stakeholders. While my response is somewhat generalized, I would be interested in consulting any survey data you may have on the site, such as fish species demographics or comparative habitat structures between the current protected Area C and mobile gear-worked Area D (Zone 4), to compare habitat assemblages. While I do not possess all of the facts, such as localized VMS data and catch data, my response aims to reflect my general opinions in a fair and balanced way, accepting of all gear types.

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02: Skipper of a sports angling charter vessel:

I would like to object to any expansion of the use of inshore bottom trawled gear. It is the most destructive type of bottom fishing and further jeopardises spawning Plaice and other flatfish that come into the Skerries Bank. We rely heavily on the ability of anglers to catch large numbers of Plaice in order to be selective in the fish that are kept. All our fish are consumed by the angler in the UK and are not sold for profit and export. Catch rates have dropped consistently year on year by size and quantity and this is primarily driven by commercial over-fishing. In addition to destroying fish stocks bottom trawling also destroys rare corals and the seabed which form the base of the food chain and nursery areas for all juvenile fish species.

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03: Recreational angler with an interest in the marine environment:

As a recreational boat angler and past Chair of 2 recreational fishing clubs, very interested in fish conservation and sustainability, I believe this area is part of a wider area particularly important to the sustainability of ray, particularly Blonde Ray which are already listed as "near threatened" by the IUCN Red List. The area is also important to European Bass, with wild stocks already very low and considered endangered.

While writing, can I also suggest the 'no fish for Bass' months of February and March and extended to include January. The Bass we have been catching this month (January) are full of roe, thus impacting breeding and sustainability. Multiply our handful of Bass caught in January by the thousands of tonnes caught by commercial fishes and the consequences for Bass are frightening!

The commercial netters have access to substantial areas for fishing around Start Point, which I should be cut back rather than expanded. The inclusion of The Corridor for netting can only see the sustainability of Bass, Blonde Ray and other flatfish further threatened.

Please disallow this proposal and rework the 'no fish for Bass' period to include January.

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04: Recreational angler (shore and boat, and secretary of an angling club):

I am a recreational angler who has fished around the south Devon coast for the last 40 odd years. In that time, I have seen a dramatic decline in inshore fish stocks which can only be as a direct result of commercial activity.

The area proposed is close to the skerries which is a MCZ and as such, should have no commercial fishing on or near it. Charter boats observe a 10 fish limit per angler for plaice and any commercial activity near to the Skerries can only be to directly target Plaice and Rays which are in decline. I could fish Beesands in the 80's, 90's and even into 2000's and catch a few plaice for the table. Now, if you catch any it is a bonus!

Whilst fishing at Beesands and Slapton, I have often observed commercial trawlers that appear to be close or even on the banks and I believe that they deliberately turn off their AIS and fish illegally so any relaxation of the current zone would increase the opportunity to do so.

I can only assume that the existing restrictions are there to preserve and protect fish stocks so I don't understand why you would entertain a relaxation of these without scientific evidence that stocks have recovered, which is not the case.

End.