

Date: 05 April 2023



Sussex Inshore Fisheries and Conservation Authority
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Natural England
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Chatsworth Road
Worthing, West Sussex, BN11 1LD
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VIA EMAIL ONLY

Dear George

RE: Beachy Head East MCZ management informal consultation

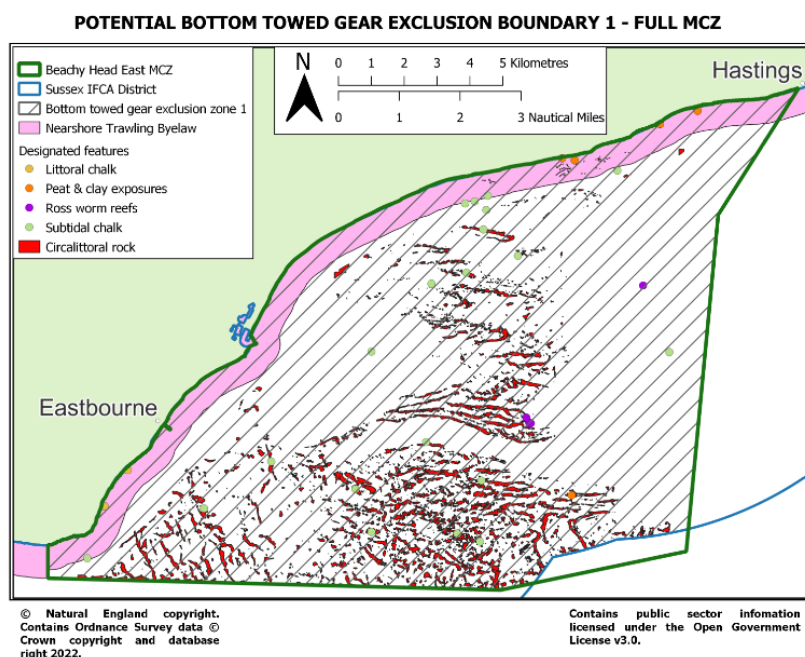
Natural England welcome the opportunity to respond to this informal consultation on the proposed management options in Beachy Head East MCZ.

Natural England have provided Sussex IFCA with advice on several iterations of their MCZ assessment for Beachy Head East MCZ which, applying Natural England's formal conservation advice for this site, details sensitivities of designated features to the pressures exerted by gear types that are used within the site.

The IFCA's MCZ assessment identifies the need for management of mobile, bottom towed gear (dredges and trawls) over the rock habitat features and *Sabellaria spinulosa* in the site. Evidence shows that these features are highly sensitive to even low levels of trawling, and therefore a single pass over an area of this feature may result in irreparable damage. Natural England agree with the conclusion in your assessment and welcome the management proposals put forward by the IFCA in their informal consultation.

Please see below for Natural England's advice on the individual options for management.

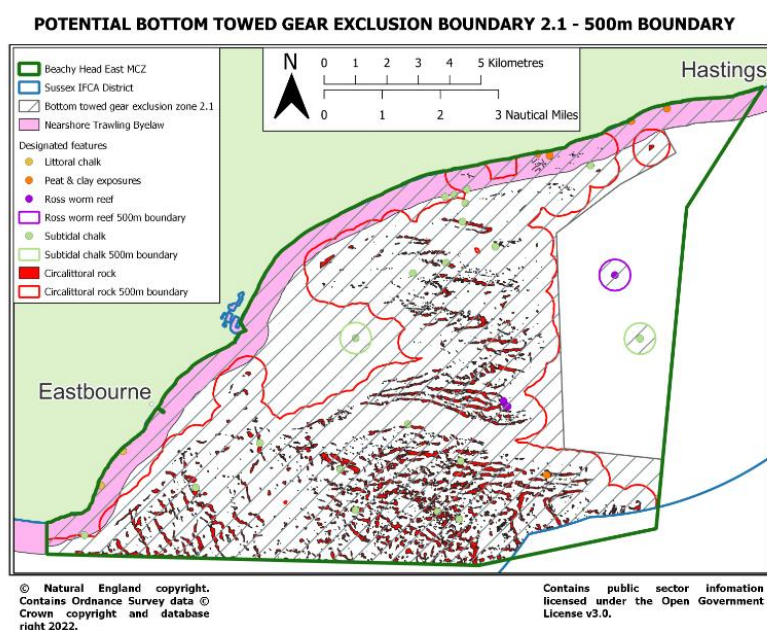
Option 1 – Full Beachy Head East site closure to bottom towed gear



Natural England advise that this option, by removing all direct pressure from the entirety of the site, has the greatest certainty of meeting the conservation objectives of the site. It would ensure all sensitive features across the site are fully protected from the pressures exerted by mobile, bottom towed gear.

Option 2 – 500m bottom towed gear boundary around reef habitats

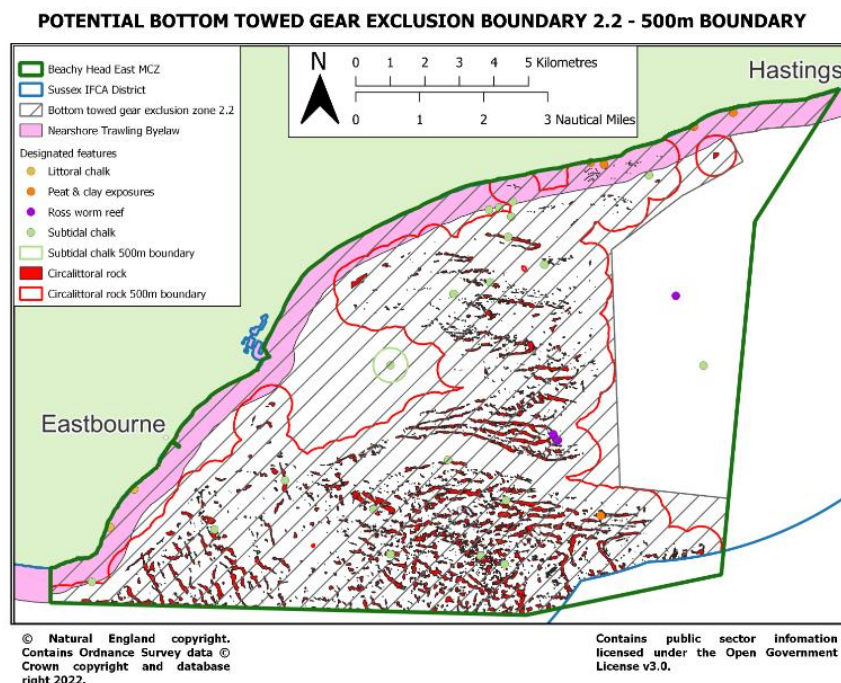
2.1 - has a 500m boundary around the 2 outlying points



Natural England advise that this option meets the conservation objectives of the site, ensuring a sufficiently precautionary 500m boundary around all mapped features including two outlying points of *Sabellaria spinulosa*. This boundary allows for a margin of error in

feature extent and a buffer in the case of unintentional interaction between the gear and feature.

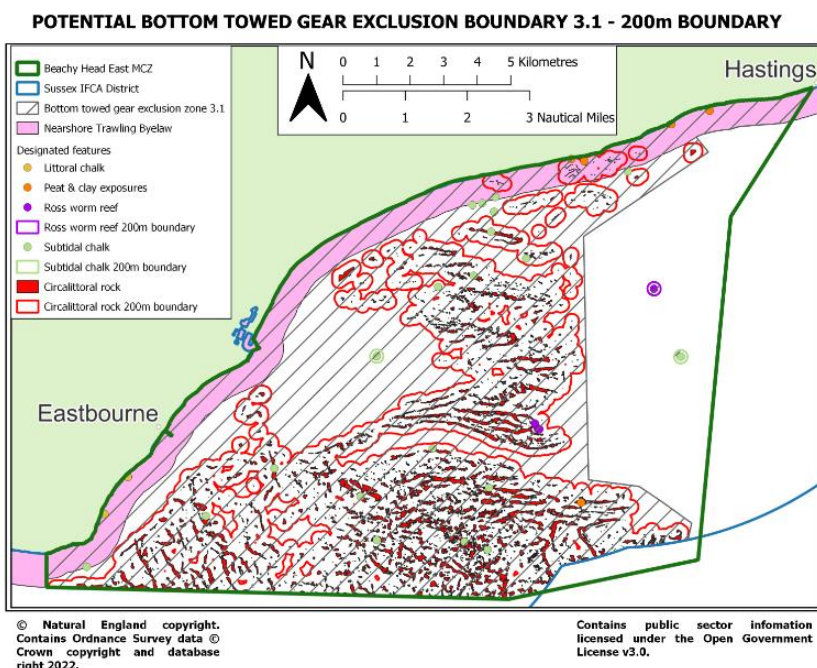
Option 2.2 - does not include the 2 outlying points in the bottom towed gear exclusion zone



Natural England advise that this option *does not* meet requirements to ensure the conservation objectives of the site are met. This is due to the fact that two records and potential areas of *Sabellaria spinulosa* remain unprotected and at risk from damage from bottom towed gear.

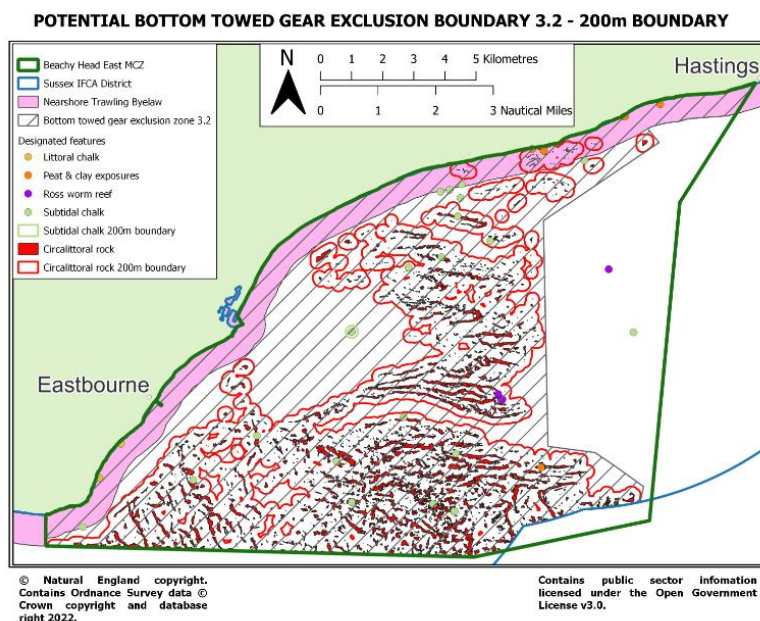
Option 3 – 200m bottom towed gear boundary around reef habitats

3.1 - has a 200m boundary around the 2 outlying points to the East



Although not the preferred option from Natural England's perspective, we advise that this management option ensures the conservation objectives of the site are being met. This is on the basis that all features are protected from damaging activity with a sufficient 200m buffer, the extent of protection afforded across the rest of the MCZ and on the provision that the IFCA commit in writing, as part of their MCZ assessment conclusion, to an adaptive risk management approach of activities within the site. Natural England would be happy to work closely with Sussex IFCA to develop plans for this adaptive risk management.

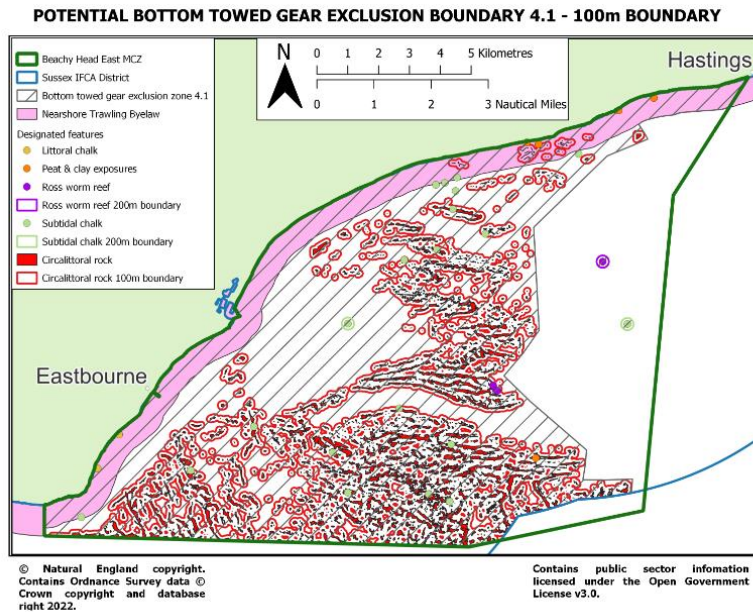
Option 3.2 - does not include the 2 outlying points in the bottom towed gear exclusion zone



Natural England advise that this option *does not* sufficiently meet management requirements to ensure the conservation objectives of the site are met. This is due to the fact that two records and potential areas of *Sabellaria spinulosa* remain at risk from damage from bottom towed gear.

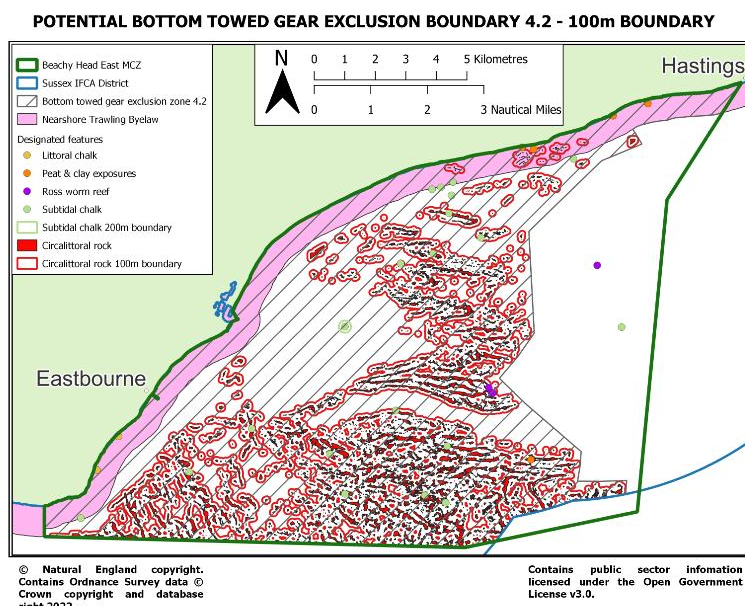
Option 4

Option 4.1 - has a 100m boundary around the 2 outlying points



Natural England advise that this option *does not* sufficiently meet management requirements to ensure the conservation objectives of the site are met. This is due to the fact the features identified as sensitive to bottom towed gear remain at risk from damage from this gear type as the 100m boundary is insufficiently precautionary to ensure a margin of error for feature extent or a substantial buffer in the case of unintentional interaction between the gear and feature.

Option 4.2 - does not include the 2 outlying points in the bottom towed gear exclusion zone



Natural England advise that this option *does not* sufficiently meet management requirements to ensure the conservation objectives of the site are met. This is due to the fact that two records and potential areas of *Sabellaria spinulosa* remain at risk from damage from bottom towed gear.

Further comments

Natural England advise that the final management plans are attached as part of the conclusion to the MCZ assessment for Beachy Head East MCZ. Natural England can then provide our final formal advice on this as a complete document. This will ensure the IFCA have a robust audit trail to support their decision making process, fulfilling their duties under the Marine and Coastal Access Act 2009.

Natural England have commissioned a site wide survey of Beachy Head East MCZ which is currently being conducted, we hope to be able to share data collected from this work with the IFCA soon to support ongoing work in this site.

Yours sincerely

Giulietta Holly

Senior Marine Adviser

Natural England