Document Control

Title	**Chichester Harbour Habitat Regulations Assessment**
Sussex IFCA Reference	Chi_HRA_LSE_AA
Author	Soloman Lucas (SL)
Approver	George Balchin (GB)
Owner	Robert Pearson (RP)
Template Used	HRA Template

Revision History

Date	Author	Version	Status	Reason	Approver(s)
23.04.2025	SL	1.0	Draft	Document created (LSE)	GB
29.04.2025	GB	1.1	Draft	Review	GB
30.04.2025	SL	1.2	Draft	Amended	GB
28.05.2025	SL	1.3	Draft	Amended following review by NE	GB
29.05.2025	GB	1.4	Draft	Amended	GB
03.06.2025	SL	1.5	Draft	Amended	SL
19.08.2025	SL	1.6	Draft	Amended adding the AA stage	GB
07.10.2025	SL	1.7	Draft	Amended AA following review from GB	GB
05.11.2025	SL	1.8	Draft	Amended AA following review by NE	GB
25.11.2025	GB	1.9	Draft	Review	GB
02.12.2025	SL	2.0	Final	Final version	GB

This document has been distributed for information and comment to:

Date	Action	Comments
30.04.2025	LSE sent to Natural England for review	Response received 22/05/2025
29.05.2025	Amended LSE sent to Natural England for review	This document had an error in the table for LSE. These errors were corrected on 03.06.2025
03.06.2025	Further corrections to LSE sent to Natural England for review	Errors in the LSE table corrected
07.10.2025	AA sent to Natural England for Review	Response received 30/10/2025
02.12.2025	Full HRA sent to Natural England	Final response received 12/12/2025

Fisheries in EMS Habitats Regulations Assessment

Sites: Chichester Harbour

European Designated Sites: UK11013 Chichester and Langstone Harbours Ramsar
UK9011011 Chichester and Langstone Harbours SPA
UK0030059 Solent Maritime SAC

Qualifying Feature(s):

Chichester and Langstone Harbours Ramsar

Black-tailed godwit, *Limosa limosa* - Passage
Dark-bellied brent goose, *Branta bernicla* - Wintering
Dunlin, *Calidris alpina alpina* - Wintering
Estuary
Grey plover, *Pluvialis squatarola* - Wintering
Redshank, *Tringa totanus* – Passage
Ringed plover, *Charadrius hiaticula* - Passage
Shelduck, *Tadorna tadorna* - Wintering
Waterbird assemblage - Wintering

Chichester and Langstone Harbours SPA

Bar-tailed godwit, *Limosa lapponica* - A157, nb
Common tern, *Sterna hirundo* - A193, b
Curlew, *Numenius arquata* - A160, nb
Dark-bellied Brent goose, *Branta bernicla bernicla* - A675, nb
Dunlin, *Calidris alpina alpina* - A672, nb
Grey plover, *Pluvialis squatarola* - A141, nb
Little tern, *Sterna albifrons* - A195, b
Pintail, *Anas acuta* - A054, nb
Red-breasted merganser, *Mergus serrator* - A069, nb
Redshank, *Tringa totanus* - A162, nb
Ringed plover, *Charadrius hiaticula* - A137, nb
Sanderling, *Calidris alba* - A144, nb
Sandwich tern, *Thalasseus sandvicensis* - A191, b
Shelduck, *Tadorna tadorna* - A048, nb
Shoveler, *Spatula clypeata* - A056, nb
Teal, *Anas crecca* - A704, nb
Turnstone, *Arenaria interpres* - A169, nb
Waterbird assemblage
Wigeon, *Mareca penelope* - A050, nb

Supporting habitat:

Coastal lagoons
Coastal reedbeds
Freshwater and grazing marsh
Salicornia and other annuals colonising mud and sand
Atlantic salt meadows
Spartina swards

Intertidal seagrass beds
Intertidal rock
Intertidal coarse sediment
Intertidal mixed sediments
Intertidal mud
Intertidal sand and muddy sand
Subtitdal coarse sediment
Subtidal mixed sediments
Subtidal mud
Subtidal sand
Water column

Solent Maritime SAC

H1110 Sandbanks which are slightly covered by sea water all the time
H1130 Estuaries
H1140 Mudflats and sandflats not covered by seawater at low tide
H1150 Coastal lagoons
H1210 Annual vegetation of drift lines
H1220 Perennial vegetation of stony banks
H1310 Salicornia and other annuals colonising mud and sand
H1320 Spartina swards (*Spartinion maritimae*)
H1330 Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)
H2120 Shifting dunes along the shoreline with *Ammophila arenaria* ('White dunes')
S1016 Desmoulin's whorl snail, *Vertigo moulinsiana*

Conservation Objectives:

Chichester and Langstone Harbours Ramsar

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change; Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site

Chichester and Langstone Harbours SPA

The site's conservation objectives apply to the site and the individual species and/or assemblage of species for which the site has been classified (the "Qualifying Features" listed above).

The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- the extent and distribution of the habitats of the qualifying features
- the structure and function of the habitats of the qualifying features
- the supporting processes on which the habitats of the qualifying features rely
- the populations of each of the qualifying features
- the distribution of qualifying features within the site

Solent Maritime SAC

The site's conservation objectives apply to the site and the individual species and/or assemblage of species for which the site has been classified (the "Qualifying Features" listed above).

The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the Favourable Conservation Status of its qualifying features, by maintaining or restoring:

- the extent and distribution of qualifying natural habitats and habitats of the qualifying species
- the structure and function (including typical species) of qualifying natural habitats
- the structure and function of the habitats of the qualifying species
- the supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- the populations of each of the qualifying species
- the distribution of qualifying species within the site

Fishing activities assessed:

Gear type(s):

Anchored nets/ Lines
- Drift nets (demersal)
- Static fixed nets
- Longlines (demersal)

Demersal seines
- Anchor/Scottish seine
- Beach seines / ring nets

Demersal Trawl
- Light otter trawl

Diving

Dredges
- Oyster
- Scallop

Pelagic fishing
- Purse seine nets

Shore-based activities
- Crab tiling
- Bait dragging
- Shrimp push nets
- Intertidal handworking (Access from land)
- Intertidal handworking (Access by vessel)
- Bait collection (digging with forks, bait pumps)

Traps
- Pots/creels
- Cuttle traps
- Fyke nets / stake-nets

Table of contents:

1. Introduction

1.1 Need for an HRA assessment

European Marine Site is a collective term used to describe a Special Areas of Conservation (SAC) or a Special Protected Areas (SPA) that contain a marine element. European Marine Sites are underpinned by either the Birds Directive in the case of SPAs, or the Habitats Directive in the case of SACs. Habitat Regulations Assessments (HRA) are required where plans or projects are proposed in European Marine Sites or Ramsar Sites, in line with The Conservation of Habitats and Species Regulations 2017 (as amended).

While there is no new plan or project in Chichester Harbour, the aim of this assessment is to determine whether management measures are required to ensure that current and ongoing fishing activity or activities will not have an adverse effect on the integrity of the site. This is achieved by firstly screening the fishing activities occurring in EMSs and related sites around Chichester Harbour, to determine if these activites have a 'Likely Significant Effect' (LSE) on designated features, on their own or in-combination with other activities. Where LSE cannot be ruled out, these activities will be taken to 'Appropriate Assessment', where the activities will be assessed on their potential to cause any 'adverse effect on the integrity' of the EMS, taking into account any appropriate mitigation measures in place, such as existing fisheries management.

For the purpose of this HRA, Sussex IFCA have used Natural England's Advice on Operations, which provides a broad scale assessment of the sensitivity of designated features to different activity-derived pressures. The Advice on Operations lists a feature as having either a low or medium/high risk profile to a partular pressure associated with the fishing activity in question. Sensitivities that have been identified as having a medium/high risk profile must be considered further in Appropriate Assessment.

The purpose of this site specific assessment document is to assess whether or not in the view of Sussex IFCA, fishing activities could have an adverse effect on the integrity of the designated features of the EMS and Ramsar sites around Chichester Harbour. This assessment will determine whether or not the fishing activites could have an adverse effect on the integrity of this EMS.

1.2 List of documents reviewed to inform this assessment

- https://designatedsites.naturalengland.org.uk/
    - Solent Maritime SAC
    - Chichester and Langstone Harbours SPA
    - Chichester and Langstone Harbours Ramsar
- Chichester and Langstone Harbour Ramsar Information Sheet: https://jncc.gov.uk/jncc-assets/RIS/UK11013.pdf
- Sussex IFCA Byelaws: https://www.sussex-ifca.gov.uk/regulations
- Chichester Harbour Conservancy Byelaws relating to vessels entering, using or leaving the harbour and notes for guidance of harbour users: https://www.conservancy.co.uk/on-the-water/navigation-safety/byelaws/#byelaws
- Chichester and Langstone Harbours SPA - Feature Condition Summary: https://designatedsites.naturalengland.org.uk/MarineCondition/Features.aspx?SiteCode=UK9011011

2. Information about the EMS

Chichester Harbour falls within the Solent Maritime SAC, Chichester and Langstone Harbour SPA and Chichester and Langstone Harbour Ramsar site, which are each underpinned by Chichester Harbour SSSI (Fig. 1).

The site contains extensive mudflats, sandflats, saltmarsh, seagrass beds, coastal lagoons, and shallow coastal waters, supporting internationally important populations of overwintering and breeding birds. Bird species rely on shingle ridges and islands for nesting as well as seagrass (Zostera spp.) beds and the rich invertebrate communities within the intertidal sediments for feeding. The site is influenced by tidal flows, with only limited freshwater input from small streams. Chichester Harbour Conservancy manages the majority of Chichester Harbour.

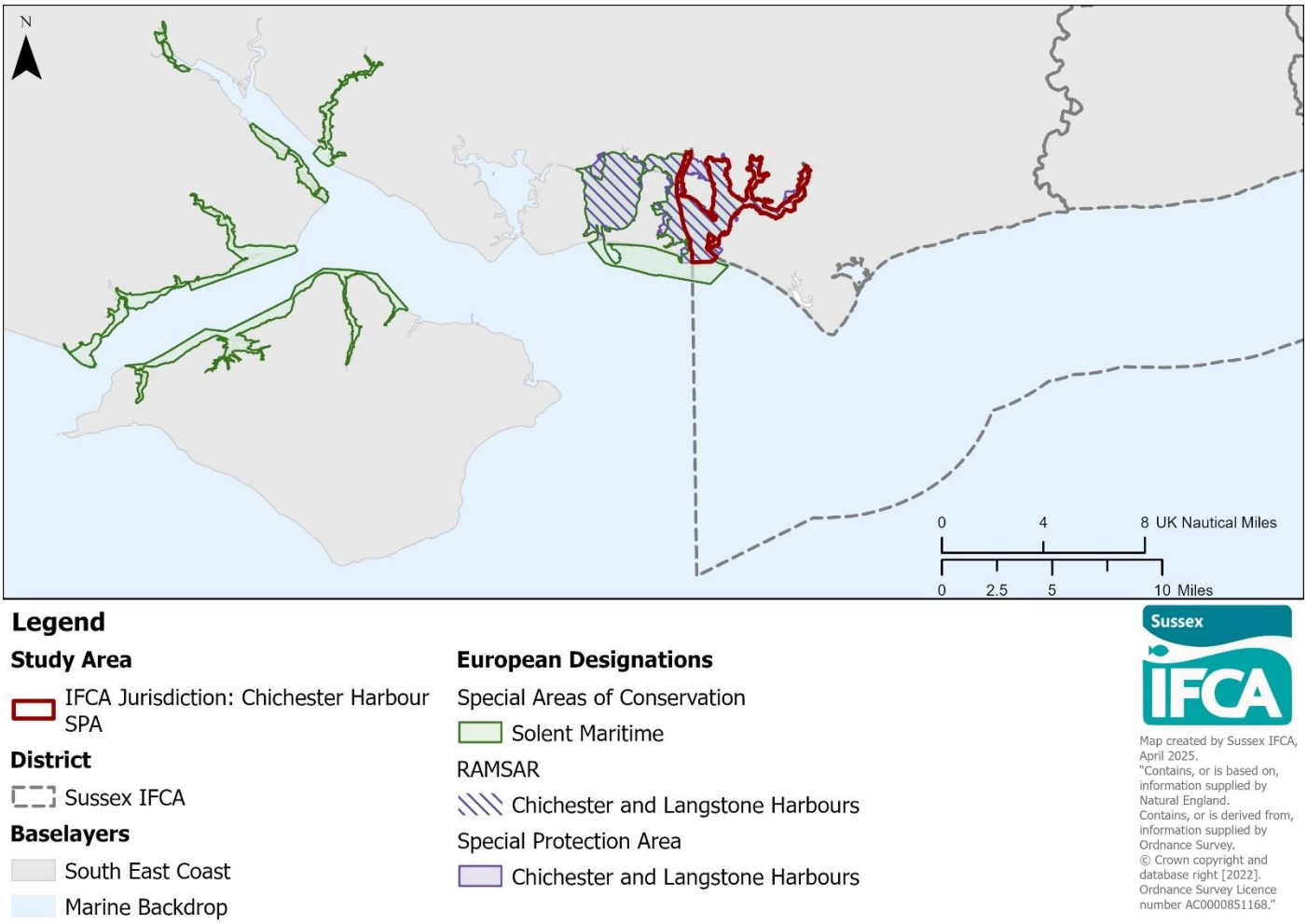

Figure 1. Protected sites overlapping within Chichester Harbour. For the purpose of this HRA, we define Chichester Harbour as the area covered by Chichester Harbour SSSI, within the Chichester and Langstone Harbour Ramsar site.

Chichester Harbour is a cross boundary site, shared between Sussex and Southern IFCA. The Sussex IFCA Diustrict boundary lies in the mid-point of the Emsworth channel, however Sussex IFCA can apply management across the entire Chichester Harbour site through local agreements. Langstone Harbour is exclusively in the district of Southern IFCA.

3. Interest feature(s) of the EMS categorised as 'Red' risk and overview of management measure(s) (if applicable)

The following Sussex IFCA Byelaws apply to Chichester Harbour:

- Chichester Harbour European Marine Site (Specified Areas) Prohibition of Fishing Method Byelaw
  - Prohibiting the use of bottom towed fishing gear, hand gathering, digging and use of an instruments used for hand gathering or digging for sea fisheries resources in specified areas
  - This byelaw was introduced to protect specified areas of eelgrass beds, mitigating 'red' risk of interactions between specified fishing gears and eelgrass beds
  - See https://www.sussex-ifca.gov.uk/regulations#chichester-emsite
- Oyster Permit Byelaw
  - Sets permit costs, minimum sizes, gear restrictions and permitted areas within Chichester Harbour for harvesting Oysters
  - See https://www.sussex-ifca.gov.uk/regulations#chichester-oyster-permit
  - The Oyster Fishery was closed in 2022 and remains closed as of 30/04/2025
- Fishing Instruments Byelaw
  - Describes gear types permitted within the 6nm limit of the Sussex IFCA district
  - As a result of measures in the byelaw, pair trawling and scallop dredging are not permitted within and in the vicinity of Chichester Harbour
  - See https://www.sussex-ifca.gov.uk/regulations#fishing-instruments
- Scallop Closed Season
  - Sets the prohibition area and closed season for scallop dredging in the Sussex IFCA district
  - The prohibition area includes Chichester Harbour year-round (also in the Fishing Instruments Byelaw above)
  - See https://www.sussex-ifca.gov.uk/regulations#scallop-closed-season
- Fixed Engines Byelaw
  - Describes rules for the placing of nets (engines) in the Sussex IFCA district
  - No fixed engines, except Fyke nets, between 1st May and 30th September across the entrance of Chichester Harbour from East Head to Sandy Point
  - See https://www.sussex-ifca.gov.uk/regulations#fixed-engines
- Hand Gathering (Restrictions and Permitting) Byelaw 2021
  - Sets rules for bag limits, permits and spatial restrictions for hand gathering in the Sussex IFCA district
  - Guidance will be published on the Sussex IFCA website in 2025
  - See https://www.sussex-ifca.gov.uk/regulations#HG-byelaw
- Minimum Size (Fish, Crustacea and Mollusc) Byelaw 2021
  - Sets minimum sizes for commonly caught species in the Sussex IFCA disctrict
  - See https://www.sussex-ifca.gov.uk/regulations#Min-size
- Nearshore Trawling Byelaw 2019
  - No fishing with towed gear is permitted within the nearshore trawling prohibition area year-round, including the entirety of Chichester Harbour
  - See https://www.sussex-ifca.gov.uk/regulations#trawling-byelaw
- Shellfish Permit Byelaw 2015
  - Established a permit system, the conditions of which include an obligation to submit catch returns, as well as regulations for marking of gear, escape gaps, and number of pots used for fishing lobster, crab, whelk, cuttlefish, and prawns in the Sussex IFCA district
  - Within the 3nm limit (which includes Chichester Harbour), a maximum of 300 lobster, 300 crab, unlimited prawn and 300 cuttlefish pots/traps may be used
  - See https://www.sussex-ifca.gov.uk/regulations#shellfish-permit-byelaw
- Vessel Length Byelaw

- Established 14m maximum vessel length within the 6nm limit, with some exceptions between 3-6nm
- The maximum vessel length for any vessel fishing in Chichester Harbour is 14m
- See https://www.sussex-ifca.gov.uk/regulations#vessel-length

In addition, the following byelaws were implemented by the Chichester Harbour Conservancy (accessible from: https://www.conservancy.co.uk/on-the-water/navigation-safety/byelaws/#byelaws):

- Digging of Bait Byelaw
  - No person shall in any part of the harbour dig for lugworm, ragworm, or any form of fishing bait within 50 ft. of any mooring, or within 20 ft. of any pile, beacon, mark, hard, causeway, jetty, quay, wharf or similar structure.
- Oyster Dredging Byelaw
  - Prohibits oyster dredging between sunset and sunrise in the harbour, unless there are special exemptions or existing private rights to dredge.
- Vessels Used For Fishing Byelaw
  - Prohibits using drift, trawl or other net fishing in areas that would obstruct or become a danger to the navigation of the harbour

4. Information about the fishing activities within the site

In the period 2020-2024, two fishing activities were observed in Chichester Harbour, including one recreational angling and one drift netting observations (Fig. 2).

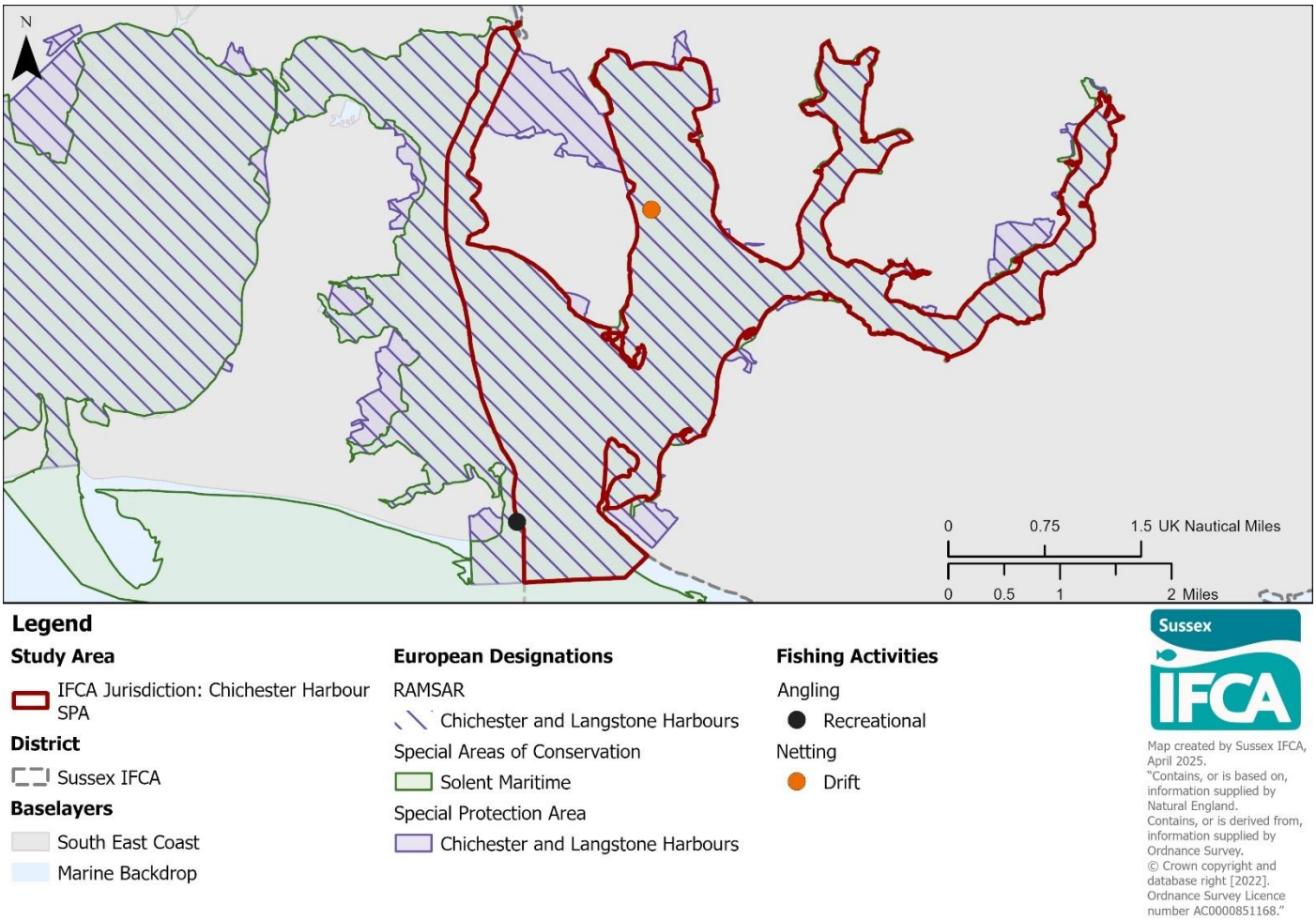

Figure 2. Fisheries activity in Chichester Harbour from Sussex IFCA sightings between 2020-2024.

Sightings effort is limited by resource at Sussex IFCA and patrols occur across the district, so patrols within Chichester Harbour are infrequent. Activities may occur unobserved by patrols, or have the potential to occur in future. In addition to observed drift netting and recreational angling activities, potting has the potential to occur (although likely to be pot storage, as opposed to active fishing) and hand gathering is known to occur within Chichester Harbour (from IFCA officer intelligence reports). Activities in Chichester Harbour have the potential to overlap with protected habitat features (Fig. 3), which will be investigated further at Appropriate Assessment.

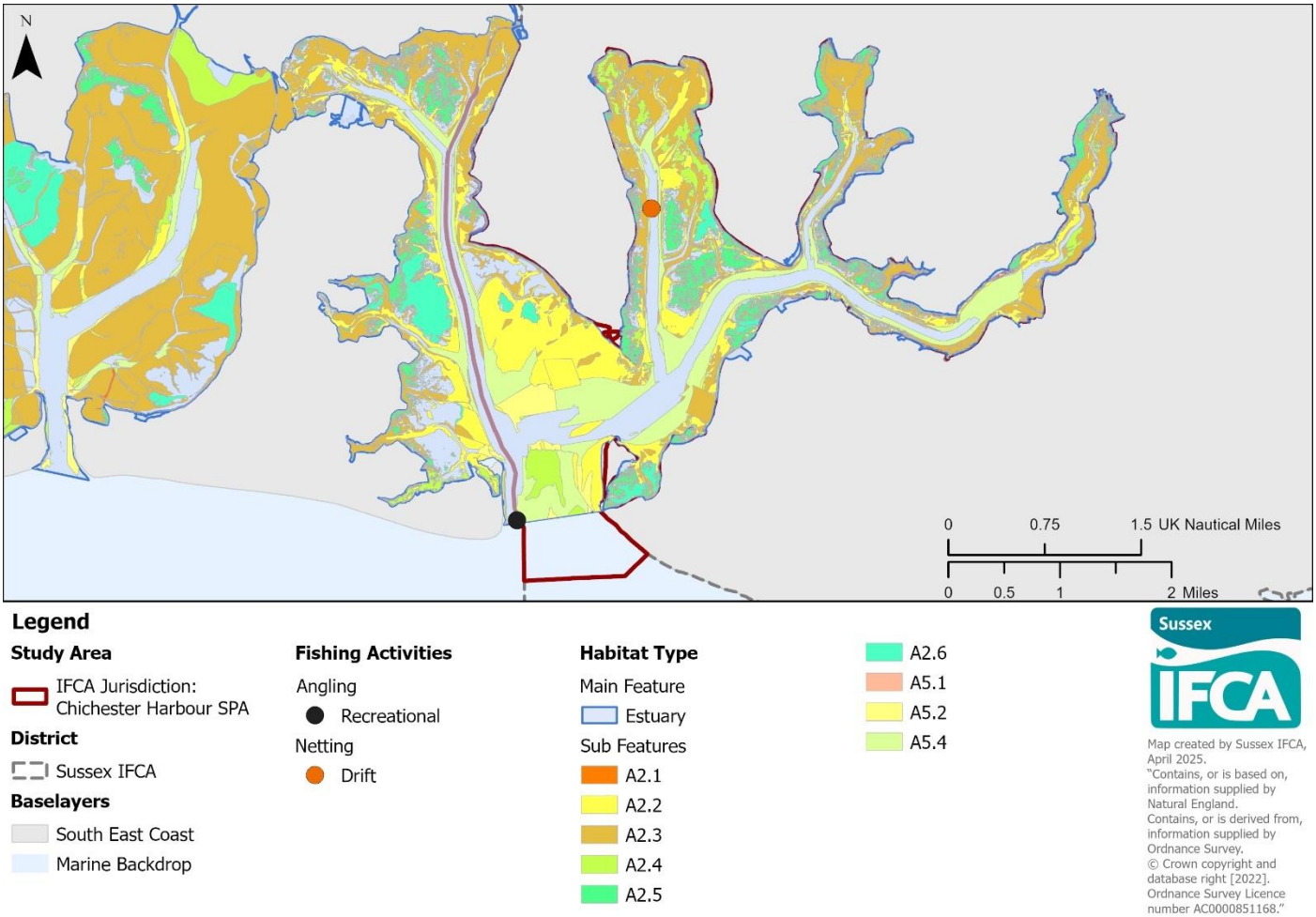

Figure 3. Overlap between fisheries activity from Sussex IFCA sightings 2020-2024 and habitat types within Chichester Harbour. EUNIS level 3 habitat classifications correspond to the following designated habitat types: A2.1 (Intertidal coarse sediment); A2.2 (Intertidal sand and muddy sand); A2.3 (Intertidal mud); A2.4 (Intertidal mixed sediments); A2.5 (Coastal saltmarshes and saline reedbeds); A2.6 (Intertidal seagrass beds); A5.1 (Subtidal coarse sediment); A5.2 (Subtidal sand); A5.4 (Subtidal mixed sediments).

5. Test for Likely Significant Effect (LSE)

The Habitats Regulations assessment (HRA) is a step-wise process and is first subject to a coarse test of whether a plan or project will cause a Likely Significant Effect on an EMS[1].

In the test for Likely Significant Effect (LSE; Table 1), pathways for Likely Significant Effect were sourced from designatedsites.naturalengland.org.uk under the 'Advice on Operations' section for each European Marine Site. Pathways which contained a 'red risk' (medium-high risk) for the designated features were deemed to have a Likely Significant Effect and were screened into the Appropriate Assessment. Where pathways were linked to designated features as a 'low risk', they were deemed to have no likely significant effect. In future assessments, if there is an evidence-based case or site specific factors that increase the risk of these pressures, they should be considered for inclusion in the Appropriate Assessment.

In addition, features that are known not to interact with fishing gears were screened out of the test for Likely Significant Effect. Desmoulin's Whorl Snail was screened out of the LSE test, given it is known to be associated with reedbeds within the site and has not been recorded for a number of years, and is therefore unlikely to be associated with fishing activity. In addition, supratidal habitat features were screened out, as they do not have any spatial overlap with fishing gear. These included:

Coastal lagoons
Coastal reedbeds
Freshwater and grazing marsh
Salicornia and other annuals colonising mud and sand
Atlantic salt meadows
Spartina swards
H1150 Coastal lagoons
H1210 Annual vegetation of drift lines
H1220 Perennial vegetation of stony banks
H1310 Salicornia and other annuals colonising mud and sand
H1320 Spartina swards (*Spartinion maritimae*)
H1330 Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)
H2120 Shifting dunes along the shoreline with *Ammophila arenaria* ('White dunes')

Table 1. Summary of the fishing activities that have been screened test for Likely Significant Effect (LSE)

Broad Gear Type (for assessment)	Fishing gear type	Does activity occur? If 'no' or 'unknown', could it potentially occur?	Pathways with Likely Significant Effect on protected species	Pathways with Likely Significant Effect on protected habitats	Pathways with no Likely Significant Effect	Sources of information
Anchored nets/lines	Gill nets Trammels Entangling	Activity hasn't been observed within the site between the years of 2020-2024 and there is no IFCO intel to suggest this activity occurs in the area. In addition, the following byelaws are in place: Fixed Engines Byelaw: No fixed engines (nets), except Fyke nets, between 1st May and 30th September across the entrance of Chichester Harbour from East Head to Sandy Point. In addition, the Chichester Harbour Conservancy prohibits setting nets that would interfere in navigation through the harbour in the Vessels Used For Fishing Byelaw.	N/A – does not occur	N/A – does not occur	N/A – does not occur	IFCA sightings data and IFCO intel
Demersal seines	Anchor seine Scottish/fly seine	Prohibited under Sussex IFCA's Fishing Instruments Byelaw.	N/A – does not occur	N/A – does not occur	N/A – does not occur	IFCA Byelaws, IFCA sightings data, IFCO intel
Demersal trawl	Beam trawl (whitefish) Beam trawl (shrimp) Beam Trawl	Prohibited in Chichester Habour under the following Sussex IFCA byelaws: • Chichester Harbour European Marine Site (Specified Areas)	N/A – does not occur	N/A – does not occur	N/A – does not occur	IFCA Byelaws, IFCA sightings data, IFCO intel

Broad Gear Type (for assessment)	Fishing gear type	Does activity occur? If 'no' or 'unknown', could it potentially occur?	Pathways with Likely Significant Effect on protected species	Pathways with Likely Significant Effect on protected habitats	Pathways with no Likely Significant Effect	Sources of information
	(pulse/wing) Heavy otter trawl Light otter trawl Multi-rig trawls Pair trawl	Prohibition of Fishing Method Byelaw • Fishing Instruments Byelaw • Nearshore Trawling Byelaw 2019				
Diving	Commercial and recreational diving	Activity hasn't been observed within the site between the years of 2020-2024 and there is no IFCO intel to suggest this activity occurs in the area, as conditions for diving are generally poor.	N/A – does not occur	N/A – does not occur	N/A – does not occur	IFCA sightings data and IFCO intel
Dredges	Scallops Mussels, clams, oysters Pump scoop (cockles, clams)	Prohibited in Chichester Habour under the following Sussex IFCA byelaws: • Scallop Closed Season • Chichester Harbour European Marine Site (Specified Areas) Prohibition of Fishing Method Byelaw • Fishing Instruments Byelaw • Nearshore Trawling Byelaw 2019	N/A – does not occur	N/A – does not occur	N/A – does not occur	IFCA Byelaws, IFCA sightings data, IFCO intel
Pelagic fishing	Mid-water trawl (single) Mid-water trawl (pair) Industrial trawls Drift nets (pelagic)	In the period 2020-2024, drift netting was observed in Chichester Harbour once in 2023. Recreational angling occurs in Chichester Harbour, observed by IFCA sightings in 2023.	*Removal of non-target species* on all bird species features.	*Removal of non-target species* and *Removal of target species* from Water column.	Above water noise Barrier to species movement Collision above water Collision below water Deoxygenation Hydrocarbon and PAH contamination Introduction of light	IFCA sightings data and IFCO intel

Broad Gear Type (for assessment)	Fishing gear type	Does activity occur? If 'no' or 'unknown', could it potentially occur?	Pathways with Likely Significant Effect on protected species	Pathways with Likely Significant Effect on protected habitats	Pathways with no Likely Significant Effect	Sources of information
	Drift nets (demersal) Longlines (demersal) Longlines (Pelagic) Handlines (rod/gurdy etc.) and rod & line angling. Jigging/ trolling Purse seine	Longlining has not been observed in Chichester Harbour between 2020-2024, although it has the potential to occur. There are unverified reports of longlining occurring in Chichester Harbour in 2024 (IFCO intel). Mid-water trawls are prohibited in Chichester Harbour under the Fishing Instruments Byelaw.			Introduction or spread of invasive non-indigenous species Litter Organic enrichment Synthetic compound contamination Transition element & organo-metal contamination Underwater noise changes Visual distrubance	
Shore-based activities	Hand gathering for shellfish Bait collection	Bait digging is known to occur frequently in Chichester Harbour, targeting ragworms and lugworms. Hand gathering for shellfish (clams and oysters) occurs in Chichester Harbour. Crab tiling and seaweed gathering have the potential to occur. The Sussex IFCA Hand Gathering (Restrictions and Permitting) Byelaw 2021 sets rules for bag limits, permits and spatial restrictions for hand gathering in the Sussex IFCA district.	*Removal of non-target species* on all bird species features. *Visual disturbance* on all bird species features, except Shoveler.	*Abrasion* and *Penetration of substratum below the seabed* on Intertidal seagrass beds; Intertidal rock; Intertidal mixed sediments; Intertidal mud; Intertidal sand and muddy sand; Subtidal seagrass beds. *Habitat structure changes (removal of substratum)* on Intertidal seagrass beds; Intertidal rock; Intertidal coarse sediment; Intertidal mixed sediment; Intertidal mud; Intertidal sand and muddy sand; Water column; Subtidal seagrass beds. *Removal of non-target species* for Intertidal seagrass beds; Intertidal	Above water noise Barrier to species movement Collision above water Collision below water Deoxygenation Hydrocarbon and PAH contamination Introduction of light Introduction or spread of invasive non-indigenous species Litter Organic enrichment Synthetic compound contamination Transition element & organo-metal contamination Underwater noise changes	IFCA Byelaws and IFCO intel

Broad Gear Type (for assessment)	Fishing gear type	Does activity occur? If 'no' or 'unknown', could it potentially occur?	Pathways with Likely Significant Effect on protected species	Pathways with Likely Significant Effect on protected habitats	Pathways with no Likely Significant Effect	Sources of information
				rock; Intertidal mixed sediments; Intertidal mud; Intertidal sand and muddy sand; Water column; Subtidal seagrass beds. *Removal of target species* on Intertidal seagrass beds; Intertidal rock; Intertidal mixed sediments; Intertidal mud; Intertidal sand and muddy sand; Water column. *Visual disturbance* on Water column.		
Traps	Pots/Creels (crustacea/ gastropods) Cuttle traps Fish Traps	Potting has not been sighted in Chichester Harbour between 2020-2024, but it has the potential to occur. Fishers are known to store strings of pots in the waters of Chichester Harbour (IFCO intel). Potting in the Sussex IFCA district is managed in the Shellfish Permit Byelaw 2015, which sets conditions and limits for use of varius pot types in the district.	*Removal of non-target species* on all bird species features.	*Abrasion* and *Removal of non-target species* on Intertidal seagrass beds; Intertidal rock; Intertidal mixed sediments; Intertidal mud; Intertidal sand and muddy sand; Subtidal seagrass beds; Subtidal coarse sediment; Subtidal mixed sediments; Subtidal mud; Subtidal sand. *Removal of non-target species* on Water column. *Removal of target species* on Subtidal mixed sediments; Subtidal mud; Subtidal sand.	Above water noise Barrier to species movement Collision above water Collision below water Deoxygenation Hydrocarbon and PAH contamination Introduction of light Introduction or spread of invasive non-indigenous species Litter Organic enrichment Penetration and/or disturbance of the substratum below the surface of the seabed Synthetic compound contamination Transition element & organo-metal contamination Underwater noise changes Visual disturbance	IFCA Byelaw, IFCA sightings data, IFCO intel, Chichester Harbour Conservancy intel

5.1 Summary of test for Likely Significant Effect

Table 2 summarises the fishing gears that are taken through to the Appropriate Assessment. Each of these gears had multiple interactions between pathways and designated features. Each of these interactions is explored further in the Appropriate Assessment.

Table 2. Was there a Likely Significant Effect taken through to Appropriate Assessment alone, or in combination?

Is the potential scale or magnitude of any effect likely to be significant?	**Alone** Yes **Comments:** LSE found and taken to Appropriate Assessment for the following gear types: Pelagic fishing Shore-based activities Traps See Table 1 for details.	**OR In-combination** No **Comments:** LSE identified alone for three gear types, not in combination. Gear types that were screened out of the LSE stage do not occur within the site, so do not contribute to any in-combination pathways. Pathways that were screened out at the LSE test (for pelagic fishing, shore-based activities, and traps) were also screened out of the in-combination assessment, because pathways that were screened into the Appropriate Assessment cover the risks to the designated features in Chichester Harbour.
Have NE been consulted on this LSE test? If yes, what was NE's advice?	Yes – minor amendments from NE, which have been incorporated into this HRA. See Annex A for the full response.	

6. Appropriate Assessment

6.1 Potential risks to features

The features and associated pathways that were screened in through the test for Likely Significant Effect are shown in full in Table 3.

Table 1. Gear types, features and pathways that were screened in from the test for Likely Significant Effect and taken through to Appropriate Assessment. Fishing gear types are those that are known to occur, or are likely to occur at the site.

Broad Gear Type (for assessment)	Fishing gear type	Pathways with Likely Significant Effect	Designated Features
Pelagic Fishing	Drift nets (pelagic)	*Removal of non-target species*	Black-tailed godwit Dark-bellied brent goose Dunlin Grey plover Redshank Ringed plover Shelduck Bar-tailed godwit Common tern Curlew Little tern Pintail Red-breasted merganser Sanderling Sandwich tern Shoveler Teal Turnstone Wigeon Waterbird assemblage Water column
	Drift nets (demersal)		
	Longlines (demersal)		
	Longlines (Pelagic)		
	Handlines (rod/gurdy etc.) and rod & line angling.	*Removal of target species*	Water column

Shore-based Activities	Hand gathering for shellfish	*Removal of non-target species*	Black-tailed godwit Dark-bellied brent goose Dunlin Grey plover Redshank Ringed plover Shelduck Bar-tailed godwit Common tern Curlew Little tern Pintail Red-breasted merganser Sanderling Sandwich tern Shoveler Teal Turnstone Wigeon Waterbird assemblage
		Visual disturbance	Black-tailed godwit Dark-bellied brent goose Dunlin Grey plover Redshank Ringed plover Shelduck Bar-tailed godwit Common tern Curlew Little tern Pintail Red-breasted merganser Sanderling Sandwich tern Teal Turnstone Wigeon Waterbird assemblage
	Bait collection	*Abrasion/disturbance of the substrate on the surface of the seabed; Penetration and/or disturbance of the substrate below the surface of the seabed, including abrasion*	Intertidal seagrass beds Intertidal rock Intertidal mixed sediments Intertidal mud Intertidal sand and muddy sand Subtidal seagrass beds
		Habitat structure changes (removal of substratum)	Intertidal seagrass beds Intertidal rock Intertidal coarse sediment Intertidal mixed sediment Intertidal mud Intertidal sand and muddy sand Water column Subtidal seagrass beds Intertidal seagrass beds

		Removal of non-target species	Intertidal rock Intertidal mixed sediments Intertidal mud Intertidal sand and muddy sand Water column Subtidal seagrass beds
		Removal of target species	Intertidal seagrass beds Intertidal rock Intertidal mixed sediments Intertidal mud Intertidal sand and muddy sand Water column
		Visual disturbance	Water column
Traps	Pots/Creels (crustacea/gastropods)	*Removal of non-target species*	Black-tailed godwit Dark-bellied brent goose Dunlin Grey plover Redshank Ringed plover Shelduck Bar-tailed godwit Common tern Curlew Little tern Pintail Red-breasted merganser Sanderling Sandwich tern Shoveler Teal Turnstone Wigeon Waterbird assemblage
	Cuttle traps	*Abrasion/disturbance of the substrate on the surface of the seabed;* *Removal of non-target species*	Intertidal seagrass beds Intertidal rock Intertidal mixed sediments Intertidal mud Intertidal sand and muddy sand Subtidal seagrass beds Subtidal coarse sediment Subtidal mixed sediments Subtidal mud Subtidal sand
	Fish Traps	*Removal of non-target species*	Water column
		Removal of target species	Subtidal mixed sediments Subtidal mud Subtidal sand

6.2 Integrity Test

In the Integrity Test, we assess if there could be an adverse effect on the site integrity through each of the fishing activities that were screened in in Table 3. The overlap of pelagic fishing sightings and habitat features are shown in Fig. 4A-B.

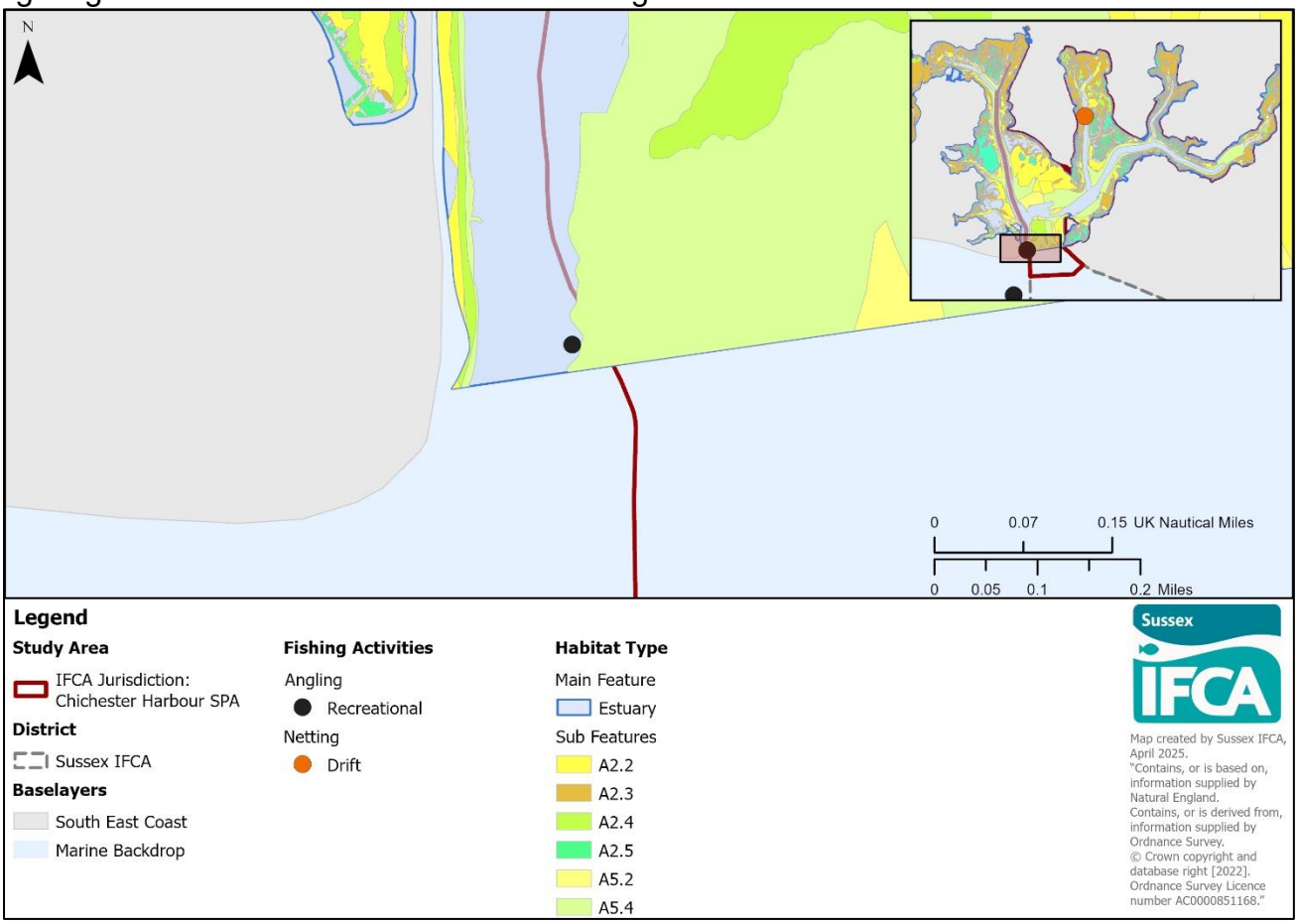

Figure 4A. Recreational angling was observed once in the period 2020-2024. This occurred in the dredged estuary channel, closest to habitat feature A5.4 (subtidal mixed sediment), although did not overlap with any designated habitat feature.

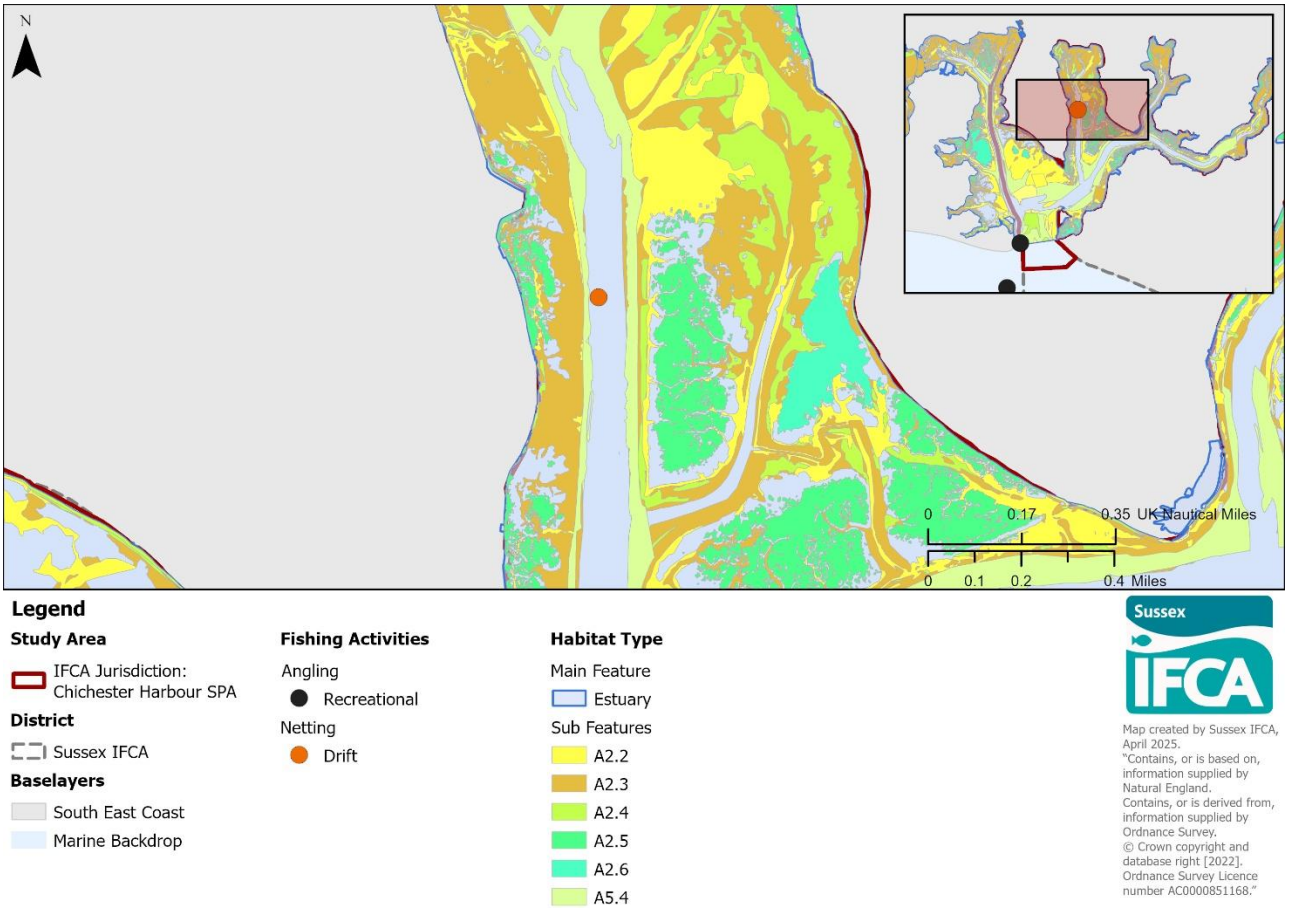

Figure 4B. Drift netting was observed once in the period 2020-2024. This occurred in the dredged estuary channel, closest to habitat feature A5.4 (subtidal mixed sediment), although did not overlap with any designated habitat feature.

6.2.1 Pelagic Fishing

Pelagic fishing activities that are known, or thought to have the potential to occur in Chichester Harbour are drift netting, longlining and recreational angling. Mid-water trawls are prohibited in Chichester Harbour under the Fishing Instruments Byelaw.

i) Removal of non-target species

Bycatch of non-target waterbird species in fishing gear is possible by entanglement while setting or hauling pelagic lines. In addition, abandoned fishing gear has caused the entanglement and death of waterbird chicks. Sensitive species include all designated waterbirds: bar-tailed godwit, common tern, curlew, dark-bellied brent goose, dunlin, grey plover, little tern, pintail, red-breasted merganser, redshank, ringed plover, sanderling, sandwich tern, shelduck, shoveler, teal, turnstone and wigeon, as well as the supporting water column habitat feature.

There were only two sighings of pelagic fishing in Chichester Harbour between 2020-2024. In addition, it is known from IFCO intelligence that pelagic fishing occurs at a low intensity in Chichester Harbour and there are no known instances of bycatch of waterbirds. It is highly unlikely that waterbirds will become entangled in recreational angling lines in Chichester Harbour.

SxIFCA is confident that the risk of removal of non-target species is low and that the fishery will have no risk of adverse effect on the features at Chichester Harbour, which utilise bony fish as a prey resource, and therefore have no risk of adverse effect on integrity or conservation status of the site.

ii) Removal of target species

Pelagic fishing could have negative ecological consequences on energy flows through food webs and the size and age composition within fish stocks by taking target species from the water column supporting habitat feature. Bony fish form part of an important prey resource for four designated bird species, including common tern (sandeel and sprat), little tern (sandeel and clupeids), red-breasted merganser (gobies, eels, flatfish and clupeids) and sandwich tern (sandeel and sprat).

The Natural England condition assessment for Chichester Harbour (2024) considered the food availability for each bird feature. The target was to maintain the distribution, abundance and availability of key food and prey items at preferred sizes. The assessment concluded that the targets for each of the tern species were met. The target for red-breasted merganser was not assessed because the feature was considered favourable and screened out.

Small fish surveys are conducted by Sussex IFCA in Chichester Harbour, in partnership with Poutsmouth University. Chichester Harbour has shown stable fish diversity across all surveyed years, with the most abundant species being bass, goby and sand smelt. In addition, Sussex IFCA Minimum Size (Fish, Crustacea and Mollusc) Byelaw 2021 sets limits for the sizes of fish caught in fishing activity. This prohibits the harvesting of small non-target species, ensuring prey availability for designated bird and habitat (water column) features.

Bony fish do not form a major part of the diet for any other bird species features. Other species feed on various plants and inverterbrates. Pelagic fishing may catch some of these target species, although there is no evidence to suggest that this happens at any scale that could cause an impact to bird species features within Chichester Harbour. There were only two sighings of pelagic fishing in Chichester Harbour between 2020-2024. In addition, it is known from IFCO intelligence that pelagic fishing occurs at a low intensity in Chichester Harbour, so is unlikely to exert a significant influence on marine food webs or age and size composition in fish stocks.

SxIFCA is confident that the risk of removal of target species is low and that the fishery will have no risk of adverse effect on the water column supporting habitat feature at Chichester Harbour. Therefore, there is no risk of adverse effect on integrity or conservation status of the site. SxIFCA support the continued monitoring of the abundance and diversity of fish in small fish surveys, to ensure fish stocks remain viable, in addition to continued sightings effort and responding to intelligence reports in Chichester Harbour.

6.2.2 Shore-based Activities

The Sussex IFCA Hand Gathering (Restrictions and Permitting) Byelaw 2021 was recently introduced to ensure the long-term sustainability of shore gathering activities on marine organisms, in the Sussex IFCA District intertidal areas. Removal of kelp, wind-blown seagrass, piddock and native oyster are all prohibited through the byelaw. Crab tiling is not permitted. Gathering of bivalve shellfish is only permitted from classified beds. There are currently no classified beds in Chichester Harbour. Reacreational and Commercial hand gathering is permitted within four permitted zones (Fig. 5). See https://www.sussex-ifca.gov.uk/regulations#HG-byelaw for more information on the boundaries of these zones.

Bag limits per person per day in the permitted zones are:

- 2 lobsters;
- 5 edible crabs;

- 30 crabs in total of any species other than Cancer Pagurus;
- 5 kilogrammes of mollusc shellfish other than piddock and native oyster (although bivalve hand gathering is prohibited throughout Chichester Harbour);
- 1 kilogramme of prawns or shrimps;
- a quantity of marine worms exceeding all of the following alternative limits, specified as 1.5 kilogrammes, 1.5 litres and 150 individual animals;
- 5 kilogrammes of intertidal seaweed;
- 0.5 kilogrammes of glasswort; or
- 0.5 kilogrammes of sea-blite.

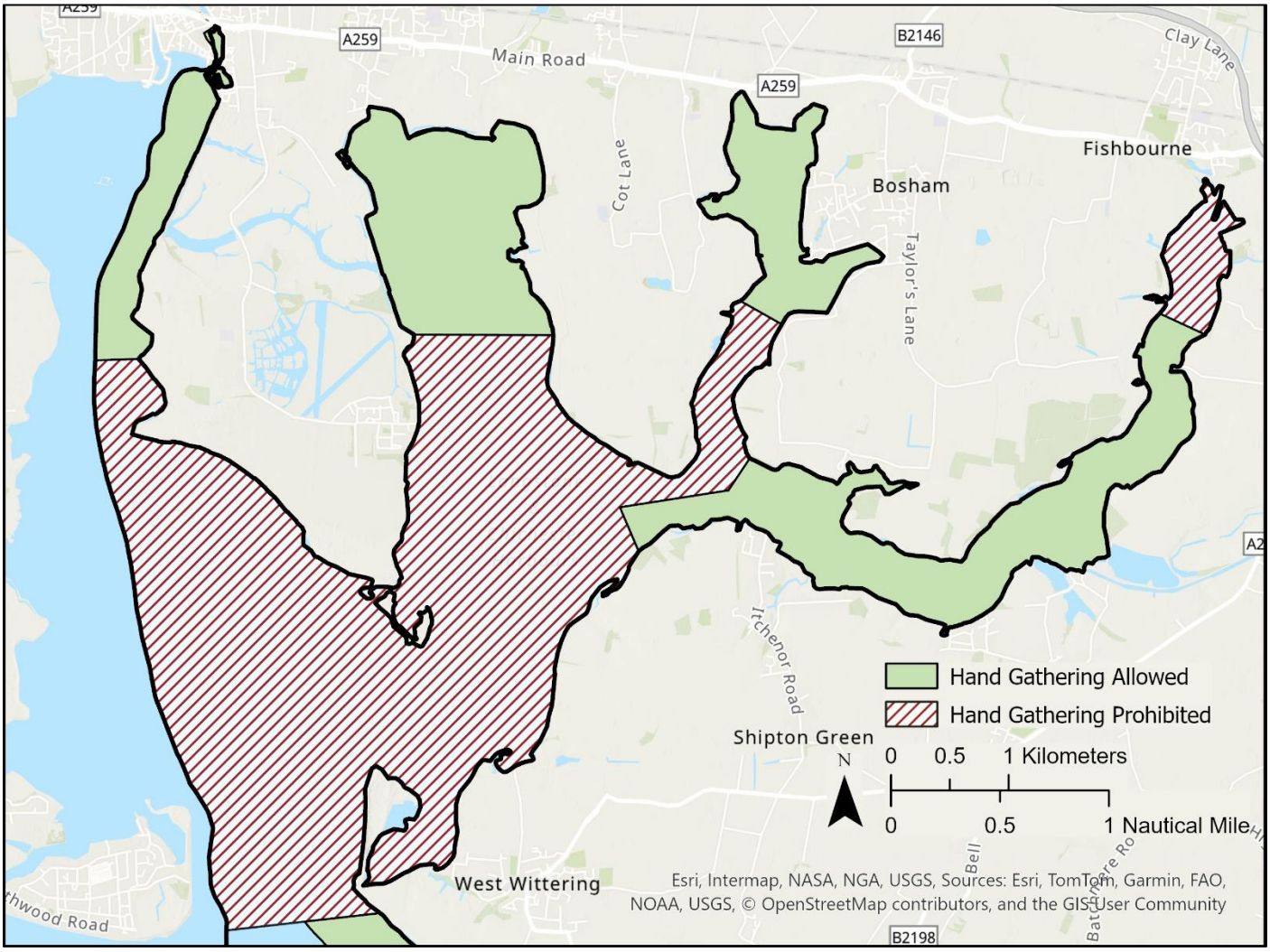

Figure 5. Permitted hand gathering areas in Chichester Harbour (shown in green), in accordance with the Hand Gathering (Restrictions and Permitting) Byelaw 2021.

The Chichester Harbour European Marine Site (Specified Areas) Prohibition of Fishing Method Byelaw prohibits the use of bottom towed fishing gear, hand gathering, digging and use of instruments required for hand gathering or digging for sea fisheries resources in specified areas. This byelaw was introduced to protect specified areas of eelgrass beds, mitigating 'red' risk interactions between specified fishing gears and eelgrass beds. Each of these areas are also covered by the prohibited areas under the Hand Gathering (Restrictions and Permitting) Byelaw 2021 mentioned above.

Finally, the Chichester Harbour Conservancy Digging of Bait Byelaw states that no person shall in any part of the harbour dig for lugworm, ragworm, or any form of fishing bait within 50 ft. of any

mooring, or within 20 ft. of any pile, beacon, mark, hard, causeway, jetty, quay, wharf or similar structure.

i) Abrasion/disturbance of the substrate on the surface of the seabed

Abrasion occurs in intertidal habitats through harvesting of target species by hand or with apparatus such as rakes and forks. Further, it is associated with the movement of people ('trampling') or vehicles used for access or participation in the fishing activity, and can result in damage to sensitive habitats. In Chichester Harbour, habitats that are sensitive to shore-based activities include intertidal seagrass beds, intertidal rock, intertidal mixed sediments, intertidal mud, intertidal sand and muddy sand and subtidal seagrass beds.

SxIFCA does not collect sightings data on shore-based activities including bait digging, hand gathering and crab tiling in Chichester Harbour. These activities were known to occur frequently throughout the area. The recent introduction of the Hand Gathering (Restrictions and Permitting) Byelaw 2021 places stricter controls on these activities at Chichester Harbour. Bait digging is permitted only within four zones, hand gathering for bivalves and crab tiling are now prohibited.

SxIFCA is working in collaboration with the Scotttish Association for Marine Science (SAMS) to conduct drone surveys in Chichester Harbour. In drone surveys, bait digging activities are recorded in pre-determined transects. These data will be used to quantify the scale of bait digging activities across Chichester Harbour.

SxIFCA is confident that the recent introduction of the Hand Gathering (Restrictions and Permitting) Byelaw 2021 will significantly reduce the risk of abrasion/disturbance of the substrate on the seabed and that the fishery will have no risk of adverse effect on supporting intertidal and subtidal habitat features at Chichester Harbour. Therefore, there is no risk of adverse effect on integrity or conservation status of the site. SxIFCA intend to continue monitoring bait gathering activities using catch returns and drone surveys, and review the results to identify if there are additional unforeseen pressures.

ii) Habitat structure changes (removal of substratum)

Habitat structure changes could occur from activities such as bait digging through the displacement/removal of intertidal substrate. In Chichester Harbour the designated habitats that are sensitive to this pressure are intertidal seagrass beds, intertidal rock, intertidal coarse sediment, intertidal mixed sediment, intertidal mud, intertidal sand and muddy sand, water column and subtidal seagrass beds.

As mentioned in section 6.2.2i), there are new controls in place to manage shore-based activities with the introduction of the Hand Gathering (Restrictions and Permitting) Byelaw 2021. Shore-based activities are being monitored using drone surveys.

SxIFCA is confident that the recent introduction of the Hand Gathering (Restrictions and Permitting) Byelaw 2021 will significantly reduce the risk of habitat structure changes and that the fishery will have no risk of adverse effect on supporting habitat features at Chichester Harbour. Therefore, there is no risk of adverse effect on integrity or conservation status of the site. SxIFCA intend to continue monitoring bait gathering activities using catch returns and drone surveys, and review the results to identify if there are additional unforeseen pressures.

iii) Penetration and/or disturbance of the substrate below the surface of the seabed, including abrasion

Harvesting of target species by hand or with apparatus such as rakes, forks or pumps involves the penetration and/or disturbance of substrate below the surface of the seabed. In addition, abrasion is caused by the movement of people on the protected habitat features. Designated features that are sensitive to this pressure are intertidal seagrass beds, intertidal rock, intertidal mixed sediments, intertidal mud, intertidal sand and muddy sand and subtidal seagrass beds.

As mentioned in section 6.2.2i), there are new controls in place to manage shore-based activities with the introduction of the Hand Gathering (Restrictions and Permitting) Byelaw 2021. Shore-based activities are being monitored using drone surveys.

SxIFCA is confident that the recent introduction of the Hand Gathering (Restrictions and Permitting) Byelaw 2021 will significantly reduce the risk of penetration, disturbance and abrasion on protected habitat features and that the fishery will have no risk of adverse effect on supporting intertidal and subtidal habitat features at Chichester Harbour. Therefore, there is no risk of adverse effect on integrity or conservation status of the site. SxIFCA intend tocontinue monitoring bait gathering activities using catch returns and drone surveys, and review the results to identify if there are additional unforeseen pressures.

iv) Removal of non-target species

Hand gathering and bait digging can result in the removal of non-target invertebrates and plants that provide food for designated waterbird assemblage, including black-tailed godwit, dark-bellied brent goose, dunlin, grey plover, redshank, ringed plover, shelduck, bar-tailed godwit, common tern, curlew, little tern, pintail, red-breasted merganser, sanderling, sandwich tern, shoveler, teal, turnstone and wigeon. In addition, the removal of non-target species could disrupt food webs and the ecology in supporting habitat features including intertidal seagrass beds, intertidal rock, intertidal mixed sediments, intertidal mud, intertidal sand and muddy sand, water column and subtidal seagrass beds.

As mentioned in section 6.2.2i), there are new controls in place to manage shore-based activities with the introduction of the Hand Gathering (Restrictions and Permitting) Byelaw 2021. Shore-based activities are being monitored using drone surveys.

SxIFCA is confident that the recent introduction of the Hand Gathering (Restrictions and Permitting) Byelaw 2021 will significantly reduce the risk of removal of non-target species on designated waterbird features and that the fishery will have no risk of adverse effect on supporting habitat features at Chichester Harbour. Therefore, there is no risk of adverse effect on integrity or conservation status of the site. SxIFCA intend to continue monitoring bait gathering activities using catch returns and drone surveys, and review the results to identify if there are additional unforeseen pressures.

v) Removal of target species

Hand gathering and bait digging can result in the removal of target plants that could disrupt food webs and the ecology in supporting habitat features including intertidal seagrass beds, intertidal rock, intertidal mixed sediments, intertidal mud, intertidal sand and muddy sand and water column.

As mentioned in section 6.2.2i), there are new controls in place to manage shore-based activities with the introduction of the Hand Gathering (Restrictions and Permitting) Byelaw 2021. Shore-based activities are being monitored using drone surveys.

SxIFCA is confident that the recent introduction of the Hand Gathering (Restrictions and Permitting) Byelaw 2021 will significantly reduce the risk of removal of target species on supporting habitat features at Chichester Harbour. Therefore, there is no risk of adverse effect on integrity or conservation status of the site. SxIFCA intend to continue monitoring bait gathering activities using catch returns and drone surveys, and review the results to identify if there are additional unforeseen pressures.

vi) Visual disturbance

Visual disturbance from shore-based activities are typically associated with breeding and feeding waterbird assemblages. Sensitive species include black-tailed godwit, dark-bellied brent goose, dunlin, grey plover, redshank, ringed plover, shelduck, bar-tailed godwit, common tern, curlew, little tern, pintail, red-breasted merganser, sanderling, sandwich tern, teal, turnstone and wigeon. In addition, the supporting water column habitat feature is sensitive to visual disturbance by shadows penetrating the surface of the water, potentially affecting the distribution of fish species. Fish commonly avoid shadows as an anti-predator mechanism and changes in their distribution due to visual disturbance would in turn affect the feeding areas of seabirds.

As mentioned in section 6.2.2i), there are new controls in place to manage shore-based activities with the introduction of the Hand Gathering (Restrictions and Permitting) Byelaw 2021. Shore-based activities are being monitored using drone surveys.

SxIFCA is confident that the recent introduction of the Hand Gathering (Restrictions and Permitting) Byelaw 2021 will significantly reduce the risk of visual disturance on designated waterbird features and that the fishery will have no risk of adverse effect on the supporting water column habitat feature at Chichester Harbour. Therefore, there is no risk of adverse effect on integrity or conservation status of the site. SxIFCA intend to continue monitoring bait gathering activities using catch returns and drone surveys, and review the results to identify if there are additional unforeseen pressures.

6.2.3 Traps

Potting in the Sussex IFCA District is managed in the Shellfish Permit Byelaw 2015, which sets conditions and limits for use of various pot types in the district. Within the 3nm limit (which includes Chichester Harbour), a maximum of 300 lobster, 300 crab, unlimited prawn, and 300 cuttlefish pots/traps may be used.

Potting was not sighted in Chichester Harbour between 2020-2024, and although it has the potential to occur, there is no intelligence to suggest that pots and traps are actively fished within the harbour. Pot storage is known to occur in deep water channels and at East Head. SxIFCA continue to collaborate with the Chichester Harbour Conservancy to understand the extent of potting and pot storage in the area.

i) Abrasion/disturbance of the substrate on the surface of the seabed

Traps and pots can cause abrasion and physical disturbance to sedimentary and rocky habitats. These disturbances can affect the survival of epiflora and epifauna living on the surface of the substratum. Sensitive habitats include intertidal seagrass beds, intertidal rock, intertidal mixed

sediments, intertidal mud, intertidal sand and muddy sand, subtidal seagrass beds, subtidal coarse sediment, subtidal mixed sediments, subtidal mud and subtidal sand.

Intel from IFCOs and Chichester Harbour Conservancy has revealed that pots and traps are regularly stored in deep water in the main Emsworth, Thorney, and Chichester channels, as well as periodically at East Head (West Wittering). In addition, pots are perdiocally stored under jetties around Chichester Harbour.

Of the sensitive habitats, pot storage has the potential to overlap with intertidal sand and muddy sand, intertidal mud and subtidal mixed sediments at East Head (Fig. 6), although exact locations of pot storage are not known. Therefore, there is a small spatial overlap between pot storage and designated habitat features across Chichester Harbour.

SxIFCA is confident that the risk of abrasion and disturbance of the seabed is low and that the fishery will have no risk of adverse effect on the supporting habitat features at Chichester Harbour. Therefore, there is no risk of adverse effect on integrity or conservation status of the site. SxIFCA support the continued monitoring of pot storage and gathering of further intelligence reports in communication with Chichester Harbour Conservancy.

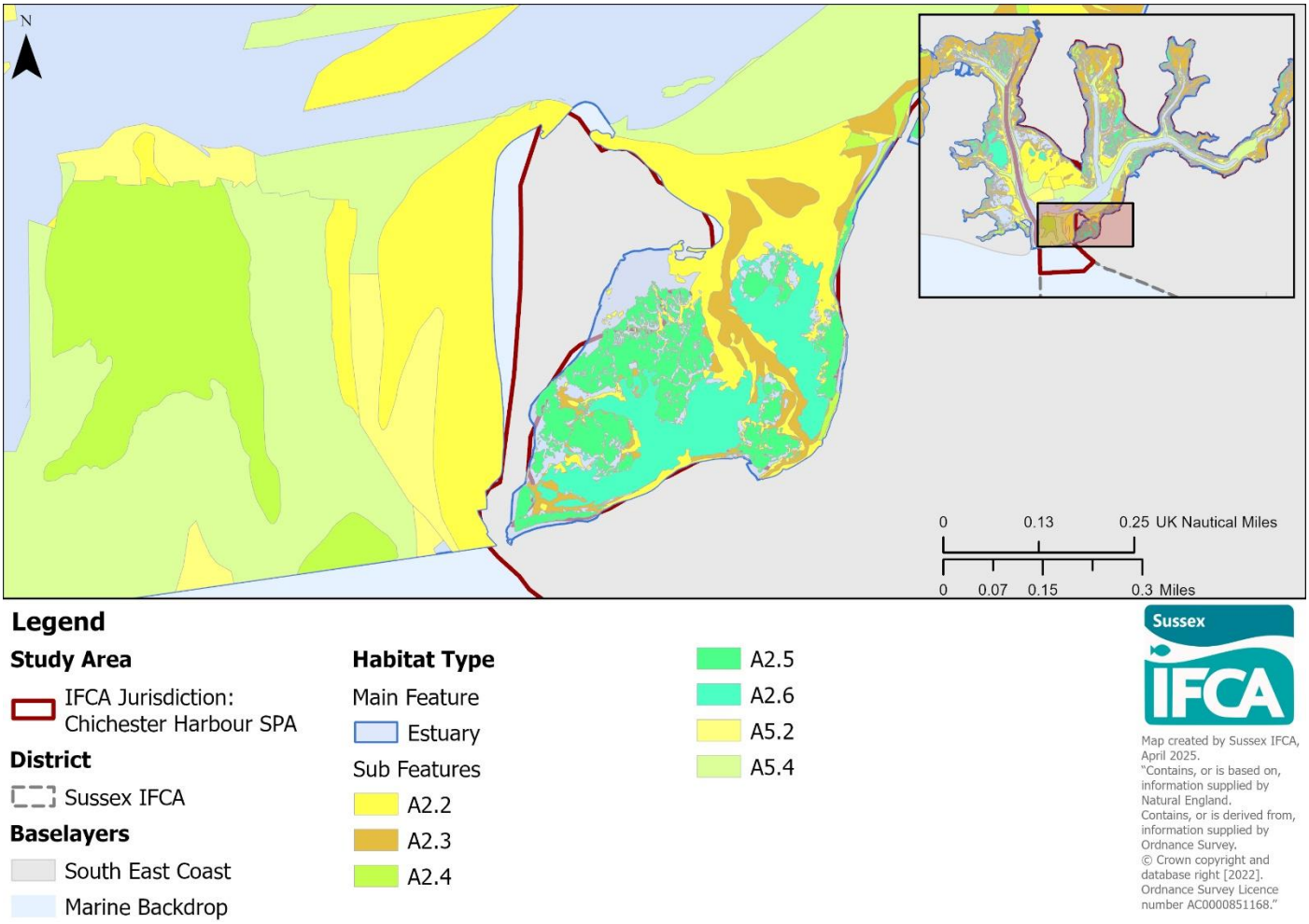

Figure 6. Deisgnated habitat features around East Head. EUNIS level 3 habitat classifications correspond to the following designated habitat types: A2.2 (Intertidal sand and muddy sand); A2.3 (Intertidal mud); A2.4 (Intertidal mixed sediments); A2.5 (Coastal saltmarshes and saline reedbeds); A2.6 (Intertidal seagrass beds); A5.2 (Subtidal sand); A5.4 (Subtidal mixed sediments). Pot storage is reported to occur only on east and northeast sides of East Head, which include habitats A2.2 (Intertidal sand and muddy sand); A2.3 (Intertidal mud) and A2.4 (Intertidal mixed sediments).

ii) Removal of non-target species

Bycatch of non-target waterbird species in fishing gear is possible by entanglement while setting or hauling traps and pots. In addition, abandoned fishing gear has caused the entanglement and death of waterbird chicks. Sensitive species include black-tailed godwit, dark-bellied brent goose, dunlin, grey plover, redshank, ringed plover, shelduck, bar-tailed godwit, common tern, curlew, little tern, pintail, red-breasted merganser, sanderling, sandwich tern, shoveler, teal, turnstone and wigeon.

In the Natural England Advice on Operations, the removal of non-target bird species through bycatch in pots were described as 'likely that pressure levels will be below the benchmark intesnity'. Therefore, although mortality is possible through this pressure, there is no evidence that this occurs in Chichester Harbour. If mortality of waterbirds is reported in pots and traps in future, this pressure should be re-assessed.

In addition, bycatch of non-target species influences the community composition of supporting habitats including intertidal seagrass beds, intertidal rock, intertidal mixed sediments, intertidal mud, intertidal sand and muddy sand, subtidal seagrass beds, subtidal coarse sediment, subtidal mixed sediments, subtidal mud, subtidal sand and water column. The physical effects on seabed communities are covered in the '*abrasion*' pressure, therefore when considering *removal of non-target species*, we considered only fishing/ harvesting of animals that do not live in or on the seabed.

As mentioned above, pot storage has the potential to overlap with intertidal sand and muddy sand, intertidal mud and subtidal mixed sediments at East Head (Fig. 6), although exact locations of pot storage are not known. Therefore, there is a small spatial overlap between pot storage and designated habitat features across Chichester Harbour.

SxIFCA is confident that the risk of removal of non-target species is low and that the fishery will have no risk of adverse effect on designated waterbird and supporting habitat features at Chichester Harbour. Therefore, there is no risk of adverse effect on integrity or conservation status of the site. SxIFCA support the continued monitoring of pot storage and gathering of further intelligence reports in communication with Chichester Harbour Conservancy.

iii) Removal of target species

Removal of target shellfish species influences the community composition of supporting habitat features including subtidal mixed sediments, subtidal mud and subtidal sand.

As mentioned above, pot storage has the potential to overlap with intertidal sand and muddy sand, intertidal mud and subtidal mixed sediments at East Head (Fig. 6), although exact locations of pot storage are not known. Therefore, there is a small spatial overlap between pot storage and designated habitat features across Chichester Harbour.

SxIFCA is confident that the risk of removal of target species is low and that the fishery will have no risk of adverse effect on deisngated waterbird and supporting habitat features at Chichester Harbour. Therefore, there is no risk of adverse effect on integrity or conservation status of the site. SxIFCA support the continued monitoring of pot storage

and gathering of further intelligence reports in communication with Chichester Harbour Conservancy.

6.2.4 In-combination Assessment

The occurrence of the Pelagic Fishing, Shore-based Activities and Traps are highly unlikely to overlap in Chichester Harbour. Pot storage occurs in deep channels and around East Head. Shore-based Activities do not occur in deep channels and is prohibited around East Head by the Hand Gathering (Restrictions and Permitting) Byelaw 2021. Of the Pelagic Fishing activities, mid-water trawls are prohibited in Chichester Harbour under the Fishing Instruments Byelaw. Angling and longlining have the potential to occur and drift netting has been sighted once in the period 2020-2024. It is known from IFCO intelligence that pelagic fishing occurs at a low intensity in Chichester Harbour and there are no known instances of conflict between pelagic fishing gears and pot storage. Therefore, it is highly unlikely that there will be any in-combination effect from fishing gears on the designated features in Chichester Harbour.

6.2.5 Summary of Integrity Test

Substantial fisheries management and mitigation measures are already in place in Chichester Harbour. Fishing effort data, habitat mapping, and the use of the enforcement team of SxIFCA Officers with support from local organisations such as the Chichester Harbour Conservancy, allows SxIFCA to compile an accurate assessment of fishing activity in the area. SxIFCA concludes that there is ***no reasonable scientific doubt*** that fisheries will not have an adverse effect on the integrity of the European Marine Sites in Chichester Harbour. Therefore, no additional management measures will be required at this time.

Annex 1 – Natural England Formal Advice on LSE stage (22nd May 2025)

Date: 22 May 2025
Our ref: 511132
Your ref: Chi_HRA_LSE_screening_V1.2.docx

Teville Gate House,
25 Railway Approach,
Worthing,
West Sussex,
BN11 1UR

Sussex IFCA
12A Riverside Business Centre
Brighton Road
Shoreham
West Sussex
BN43 6RE

BY EMAIL ONLY

Dear Sol

Consultation: Chichester & Langstone Harbour HRA Review (LSE Screening Only)

Thank you for your consultation on the above dated 30 April 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development

The following constitutes Natural England's formal advice, covering Chichester Harbour only

Natural England are content with the pressures screened out at the LSE stage and those pressures that will be taken through to Appropriate Assessment to be considered in further detail.

In addition, we have the following comments regarding the assessment:

- Chichester and Langstone Harbours Ramsar site is also designated for ringed plover *Charadrius hiaticula*, and shelduck *Tadorna tadorna,* as well as the waterbird assemblage, and we recommend that these are included in the qualifying features list.
- We are content with the decision to screen out Desmoulin's Whorl Snail given it is known to be associated with reedbeds within the site and has not been recorded for a number of years, and is therefore unlikely to be associated with fishing activity, however, we recommend providing justification for not assessing it/screening it out within the HRA. Similarly, other SAC features may be screened out based on a lack of spatial overlap with fishing-related pressures, and this should be described and justified within the HRA.
- We note that Table 2 contains the screening for features across all designated sites. Whilst we are content with the outcome of the screening, we would recommend the pathways with Likely Significant Effect are listed for each specific designated site and their associated features to provide clarity on the breadth of impacts for each site respectively. In addition, we note that protected habitat features do overlap across multiple designations, however some impact pathways are specific to certain designated features.
- It may be helpful to list pathways with Likely Significant Effects on protected habitats / species as bullet points to clearly list each pressure (for example, row 1 column 5 of Table 2: Abrasion and removal of non-target species are separate pressures whereas 'sand and muddy sand' is a single feature).
- We agree with the decision to screen out pathways defined as low impact in our Advice on

Operations, but note that for many of these pathways, this is contingent on the intensity of impact, spatial and temporal scale, or proximity to feature, and some text within the HRA to explain that they can be screened out on this basis would be beneficial.

- It may be beneficial to include a summary at the end listing the features carried forward for each activity (or all features carried forward if potentially affected features are the same for each activity) to allow for features not likely to be affected by the activity to be clearly screened out.

Other Relevant Matters

Condition Assessment

We would like to draw your attention to the Chichester and Langstone Harbour SPA condition assessment which was completed in December 2024. This contains the current condition of features, and further information contained in the assessment which may support decisions at Appropriate Assessment stage.

For any queries regarding this letter, for new consultations, or to provide further information on this please send your correspondences to Marine-EasternChannel@naturalengland.org.uk.

Yours sincerely,

Danni Barratt
Marine Higher Officer
Sussex and Kent Area Team

Annex 2 – Natural England Formal Advice on AA stage (30th October 2025)

Date: 30 October 2025
Our ref: 529553
Your ref: Chi_HRA_LSE_AA

Sussex IFCA
12A Riverside Business Centre
Brighton Road
Shoreham
West Sussex
BN43 6RE

Teville Gate House
25 Railway Approach
Worthing
West Sussex
BN11 1UR

BY EMAIL ONLY

Dear Sol

Consultation: Chichester and Langstone Harbour HRA Review (Appropriate Assessment/Full HRA)

Thank you for your consultation on the above dated 07 October 2025 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The following constitutes Natural England's formal advice, covering the area of Chichester & Langstone Harbour SPA that falls within the boundaries of the Sussex IFCA district only.

Natural England concur with the conclusions of no Adverse Effects on Integrity of the designated sites assessed, based on fishing activities within the site that have been scoped into the Appropriate Assessment, and the management of these.

In addition, we make the following comments regarding the assessment:

- Further discussion of the byelaws in place for certain gear types and locations may provide greater justification for no adverse effect on integrity. For example, mention of the Chichester Harbour European Marine Site Prohibition of Fishing Method Byelaw under the Appropriate Assessment further justifies management of shore-based activities on intertidal seagrass, and further supports the conclusion of no Adverse Effect on Integrity for this activity type.
- At this stage we concur that the introduction of the Hand Gathering Byelaw will significantly reduce the impacts of shore-based activities within the SPA, with the acknowledgement that current management goes some way to addressing outstanding impacts and there is currently a lack of distinct monitoring of the intensity of shore-based activities. We welcome the intention to conduct further monitoring to gain a clearer understanding of the intensity of shore-based activities through drone surveys. We reiterate our comments to the formal consultation on the Hand Gathering Byelaw, in which we supported the implementation of the management, subject to a review to determine its success.
- We concur with the outcomes of the Appropriate Assessment around pots and traps, but suggest that the text within the integrity test section could reiterate the evidence of no or limited potting occurring within the site to ensure the use of pots for fishing, as well as the storage of pots within

the site, is sufficiently considered.

- While we agree that there are no in-combination impacts to assess at the LSE stage, this should be evidenced within table 2 to demonstrate that in-combination impacts have been considered, for those impacts which have been screened out at LSE stage as well as those screened in. As these activities do not occur within the site, this may provide justification to rule out LSE in combination.
- An in-combination assessment should also be considered at the Appropriate Assessment stage, once Adverse Effect on Integrity has been ruled out alone, to ensure there is then no AEoI in-combination with any other activities.

For any queries regarding this letter, for new consultations, or to provide further information on this please send your correspondences to Marine-EasternChannel@naturalengland.org.uk

Yours sincerely

Kelly Jones
Marine Officer - Sussex and Kent

Annex 3 – Natural England Final Response (12th December 2025)

Date: 12 December 2025
Our ref: 529553
Your ref: Chi_HRA_LSE_AA_FINAL.docx

Teville Gate House
25 Railway Approach
Worthing
West Sussex
BN11 1UR

Sussex IFCA
12A Riverside Business Centre
Brighton Road
Shoreham
West Sussex
BN43 6RE

BY EMAIL ONLY

Dear Sol

Consultation: Final Chichester Harbour HRA Review (Appropriate Assessment/Full HRA)

Thank you for your consultation on the above dated 02 December 2025 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The following constitutes Natural England's formal advice, covering the area of Chichester and Langstone Harbour SPA that falls within the boundaries of the Sussex IFCA district only.

We have reviewed the updates made to the Chichester Harbour Appropriate Assessment and can confirm that these changes address the comments we provided in our previous letter (dated 30th October 2025) and that we are satisfied with the conclusions of the final HRA.

For any queries regarding this letter, for new consultations, or to provide further information on this please send your correspondences to Marine-EasternChannel@naturalengland.org.uk.

Yours sincerely

Kelly Jones
Marine Officer – Sussex and Kent