



Wednesday 17<sup>th</sup> April 2024

**Consultation Response**  
**Beachy Head East Marine Conservation Zone**  
**Marine Protected Area Byelaw 2023 Schedule 5**

The Angling Trust supports the proposed byelaw to prohibit towed gear within Beachy Head East Marine Conservation Zone (MCZ); however, we believe that the prohibition should be extended across the whole site to include both Zone 1 and Zone 2 to provide the greatest protection for its designated features.

As demonstrated by Figure 4 in the Byelaw Impact Assessment, the highest frequency of trawling activity occurs within Zone 2 of the MCZ. Figure 5 also demonstrates that some dredging activity currently takes place within Zone 2 of the site. It is therefore the Angling Trust's view that to maximise protection for the site's designated features, towed gear should also be prohibited from Zone 2 and a whole-site approach should be adopted. Adopting a whole-site approach to prohibiting towed-gears is important for maintaining the integrity of the site. It is unnecessary to permit towed gears within the site boundaries as this gear type will be permitted in the surrounding area beyond the MCZ boundaries. It is the Angling Trust's view that permitting both commercial trawling and dredging to operate within the boundaries of marine protected areas is contradictory to the objectives of the site to maintain and recover their designated features.

As the largest inshore MCZ within Sussex IFCA's district, adopting a whole-site approach to prohibiting towed-gear within the site's boundaries will deliver socio-economic benefits to the coastal community, such as via recreational angling and other forms of ocean-based tourism, along with fulfilling national objectives under the 25 Year Environment Plan and UK Government commitments to transition to environmentally sensitive forms of fishing under the Fisheries Act and accompanying Joint Fisheries Statement.

**Recreational Angling**

Beachy Head East MCZ is an important area for recreational sea angling. As a sector recreational angling plays an integral role in delivering social and economic benefits to Sussex through individual participation in shore and boat angling, angling competitions, charter boat businesses, and supporting tackle shop businesses. Angling tourism to Sussex also supports local businesses, such as hotels and restaurants, particularly within the peak summer months.

Beachy Head East MCZ features important nearshore nursery areas for plaice and Dover sole. It also provides feeding grounds for cuckoo wrasse, bib, poor cod, black seabream, European eel and small spotted catshark. Many of these species are recreationally important, particularly for catch-and-release fisheries. Adopting a whole-site approach to prohibiting towed gears within Beachy Head East MCZ will protect these recreationally important species, their habitats and

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prey species from the damaging impacts of commercial towed gears, enabling the recreational sector, and low-impact commercial fisheries, to benefit as a result of increases in species abundance and size. Larger individuals within populations support better recruitment, helping to recover fish stocks and support sustainable fisheries. Increased abundance and size of fish also supports the development of recreational fisheries with research indicating that larger specimens drive angler satisfaction and angler willingness to pay, therefore generating socio-economic benefits for local communities and promoting low impact, sustainable fishing.

### **Rare Habitat Protection & Blue Carbon**

Sovereign Shoals within Beachy Head East MCZ is an important recreational sea angling mark as well as being an important habitat for marine wildlife due to its sandstone reef and chalk outcrops. It is acknowledged that Beachy Head East MCZ contains some of the largest known underwater chalk seascapes – a globally rare habitat. The Angling Trust believe that it is imperative that Sussex IFCA protect this globally important habitat from the damaging impacts of towed gear by adopting a whole-site approach to prohibiting towed-gear within the site's boundaries.

Biologically important biogenic reefs are also important for marine biodiversity and a vital source of blue carbon. It is estimated that biogenic reefs annually sequester more carbon on a per area basis, compared to terrestrial habitats. Physical disturbances, such as those caused by commercial towed gears, are widely evidenced to threat and potentially irreversibly damage, these biologically important habitats.

### **Other Considerations**

The Angling Trust note references to benefits for the deployment of commercial static gear as a result of prohibiting towed gears, using the example of Lyme Bay within the Byelaw Impact Assessment. The Angling Trust has concerns regarding the potential of increased gear conflicts with the recreational sector and unforeseen consequences for other species if adequate management for static gears is also not in place.

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