

Fisheries in European Sites Likely Significant Effect audit for **Amber** and **Green** risk categories

NWIFCA-RA-SPA-001

Date completed: 03/06/2015

Completed by: S. Temple & A. Leadbeater

Site: **Ribble and Alt Estuaries**

European Designated Sites: UK9005103 Ribble and Alt Estuaries Special Protection Area (SPA)

UK11057 Ribble and Alt Estuaries Ramsar
Sefton Coast SAC

European Marine Site **Ribble and Alt Estuaries**

Qualifying Feature(s):

SPA and Ramsar

A037 *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding)
A038 *Cygnus cygnus*; Whooper swan (Non-breeding)
A040 *Anser brachyrhynchus*; Pink-footed goose (Non-breeding)
A048 *Tadorna tadorna*; Common shelduck (Non-breeding)
A050 *Anas penelope*; Eurasian wigeon (Non-breeding)
A052 *Anas crecca*; Eurasian teal (Non-breeding)
A054 *Anas acuta*; Northern pintail (Non-breeding)
A130 *Haematopus ostralegus*; Eurasian oystercatcher (Non-breeding)
A137 *Charadrius hiaticula*; Ringed plover (Non-breeding)
A140 *Pluvialis apricaria*; European golden plover (Non-breeding)
A141 *Pluvialis squatarola*; Grey plover (Non-breeding)
A143 *Calidris canutus*; Red knot (Non-breeding)
A144 *Calidris alba*; Sanderling (Non-breeding)
A149 *Calidris alpina alpina*; Dunlin (Non-breeding)
A151 *Philomachus pugnax*; Ruff (Breeding)
A156 *Limosa limosa islandica*; Black-tailed godwit (Non-breeding)
A157 *Limosa lapponica*; Bar-tailed godwit (Non-breeding)
A162 *Tringa totanus*; Common redshank (Non-breeding)
A183 *Larus fuscus*; Lesser black-backed gull (Breeding)
A193 *Sterna hirundo*; Common tern (Breeding)
Waterbird assemblage
Seabird assemblage
Breeding Waterbird Assemblage

Natterjack toad (NON MARINE)

SAC

H2110. Embryonic shifting dunes
H2120. Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); Shifting dunes with marram
H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland*
H2150. Atlantic decalcified fixed dunes (*Calluno-Ulicetea*); Coastal dune heathland*
H2170. Dunes with *Salix repens* ssp. *argentea* (*Salicion arenariae*); Dunes with creeping willow
H2190. Humid dune slacks
S1166. *Triturus cristatus*; Great crested newt
S1395. *Petalophyllum ralfsii*; Petalwort

Site sub-feature(s):

SPA and Ramsar

Supporting Habitat:

- intertidal rock
- intertidal sand and muddy sand
- intertidal mud
- intertidal mixed sediment
- coastal saltmarshes and saline reedbeds – (Saltmarsh)
- freshwater and coastal grazing marsh (Saltmarsh)
- coastal sand dunes (Sand dunes)
- water column

Great crested newt and Natterjack toad Supporting Habitat: Coastal sand dunes

Generic sub-feature(s):

Estuarine birds, Surface feeding birds, Benthic feeding seabirds, Intertidal mud and sand, Saltmarsh spp.

High Level Conservation Objectives:

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified and the Ramsar Site and the wetland habitats and/or species for which the site has been listed (the 'Qualifying Features' listed above), 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 and ensure that the site contributes to achieving the wise use of wetlands across the UK, 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.

Sefton Coast SAC

With regard to the SAC and the natural habitats and/or species for which the site has been designated (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 Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

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

Fishing activities assessed:

Gear type(s):	
Towed (demersal)-	Beam trawl (pulse/ wing), Heavy otter trawl, Pair trawl, Anchor seine, Scottish/fly seine,
Towed (pelagic)-	Mid-water trawl (single), Mid-water trawl (pair), Industrial trawls,
Dredges (towed)-	Dredge (scallop), Dredge (mussel/clam/oyster), Dredge (pump scoop),
Dredges (other)-	Dredge (suction), Dredge (tractor),
Static (pots/traps)-	Cuttle pots, Fish traps,
Lines-	Longlines (pelagic),
Seine nets and other-	Purse seine, Fyke nets,
Miscellaneous-	Commercial diving, Bait dragging.

1. Introduction

1.1 Need for a Likely Significant Effect assessment

In 2012, the Department for Environment, Food and Rural Affairs (Defra) announced a revised approach to the management of commercial fisheries in European Marine Sites (EMS). The objective of this revised approach is to ensure that all existing and potential commercial fishing activities are managed in accordance with Article 6 of the Habitats Directive.

This approach is being implemented using an evidence based, risk-prioritised, and phased basis. Risk prioritisation is informed by using a matrix of the generic sensitivity of the sub-features of EMS to a suite of fishing activities as a decision making tool. These sub-feature-activity combinations have been categorised according to specific definitions, as red, amber, green or blue.

Activity/feature interactions identified within the matrix as red risk have the highest priority for implementation of management measures by the end of 2013 in order to avoid the deterioration of Annex I features in line with obligations under Article 6(2) of the Habitats Directive.

Activity/feature interactions identified within the matrix as amber risk require a site-level assessment to determine whether management of an activity is required to conserve site features. Activity/feature interactions identified within the matrix as green also require a site level assessment if there are potential “in combination effects” with other plans or projects.

Some European Sites within the NWIFCA District consist of features that are not fully marine (eg. sand dunes) and therefore fall outwith of the EMS Review process. They have not been included in the original risk matrix. Due to the nature of some of the fisheries in the District, particularly intertidal fisheries, the NWIFCA has adopted the approach of carrying out full HRA on all the features (including non-marine) within European Sites to ensure that any potential risk from fishing activity has been identified and assessed.

Site level assessments are being carried out in a manner that is consistent with the provisions of Article 6(3) of the Habitats Directive, that is to determine that fishing activities are not having an adverse effect on the integrity of the site, to inform a judgement on whether or not appropriate steps are required to avoid the deterioration of natural habitats and the habitats of species as well as disturbances of the species for which the areas have been designated, in so far as such disturbance could be significant in relation to the objectives of this directive.

Fishing activity / feature interactions that have been classified as “Blue” in the Matrix (i.e. no possibility of interaction) are not considered in this assessment.

Fishing activities included in this assessment have not recently occurred in the European Site. Certain fishing activities may have occurred historically in the past, but have since ceased to operate. More details can be found in the relevant “Fishing activity information from local IFCOs” spreadsheet (Jan 2014). As with activities that have never occurred, the NWIFCA continues to monitor fishing activity in the district and will assess any new fishing activity if and when it occurs.

2. Test for Likely Significant Effect (LSE)

Qualifying Feature	Sub-feature	Gear type	Potential for Likely Significant Effect?	Justification and evidence
A037 <i>Cygnus columbianus bewickii</i> ; Bewick's swan (Non-breeding)	Intertidal rock, intertidal sand and muddy sand, intertidal mud, intertidal mixed sediment, coastal saltmarshes and saline reedbeds – (Saltmarsh), freshwater and coastal grazing marsh (Saltmarsh), coastal sand dunes (Sand dunes), Water column	Beam trawl (pulse/wing), Heavy otter trawl, Pair trawl, Anchor seine, Scottish/fly seine, Mid-water trawl (single), Mid-water trawl (pair), industrial trawls, Dredge (scallop), Dredge (mussel/clam/oyster), Dredge (pump scoop), Dredge (tractor), Dredge (suction), Cuttle pots, Fish traps, Longlines (pelagic), Purse seine, Fyke nets, Commercial diving, Bait dragging.	NO	Activity does not currently occur and has not recently occurred in European Site (IFCO local knowledge (S. Brown, Jan 2014)). Anchor seine, Scottish/Fly seine prohibited by NWSFC Byelaw 3.
A038 <i>Cygnus cygnus</i> ; Whooper swan (Non-breeding)				
A040 <i>Anser brachyrhynchus</i> ; Pink-footed goose (Non-breeding)				
A048 <i>Tadorna tadorna</i> ; Common shelduck (Non-breeding)				
A050 <i>Anas penelope</i> ; Eurasian wigeon (Non-breeding)				
A052 <i>Anas crecca</i> ; Eurasian teal (Non-breeding)				
A054 <i>Anas acuta</i> ; Northern pintail (Non-breeding)				
A130 <i>Haematopus ostralegus</i> ; Eurasian oystercatcher (Non-breeding)				
A137 <i>Charadrius hiaticula</i> ; Ringed plover (Non-breeding)				
A140 <i>Pluvialis apricaria</i> ; European golden plover (Non-breeding)				
A141 <i>Pluvialis squatarola</i> ; Grey plover (Non-breeding)				
A143 <i>Calidris canutus</i> ; Red knot (Non-breeding)				

A144 <i>Calidris alba</i> ; Sanderling (Non-breeding)				
A149 <i>Calidris alpina alpina</i> ; Dunlin (Non-breeding)				
A151 <i>Philomachus pugnax</i> ; Ruff (Breeding)				
A156 <i>Limosa limosa islandica</i> ; Black-tailed godwit (Non-breeding)				
A157 <i>Limosa lapponica</i> ; Bar-tailed godwit (Non-breeding)				
A162 <i>Tringa totanus</i> ; Common redshank (Non-breeding)				
A183 <i>Larus fuscus</i> ; Lesser black-backed gull (Breeding)				
A193 <i>Sterna hirundo</i> ; Common tern (Breeding)				
Waterbird assemblage	Intertidal rock, intertidal sand and muddy sand, intertidal mud, intertidal mixed sediment, coastal saltmarshes and saline reedbeds – (Saltmarsh), freshwater and coastal grazing marsh (Saltmarsh), coastal sand dunes (Sand dunes), Water column	Beam trawl (pulse/wing), Heavy otter trawl, Pair trawl, Anchor seine, Scottish/fly seine, Mid-water trawl (single), Mid-water trawl (pair), industrial trawls, Dredge (scallop), Dredge (mussel/clam/oyster), Dredge (pump scoop), Dredge (tractor), Dredge (suction), Cuttle pots, Fish traps, Longlines (pelagic), Purse seine, Fyke nets, Commercial diving, Bait dragging.	NO	Activity does not currently occur and has not recently occurred in European Site (IFCO local knowledge (S. Brown, Jan 2014)). Anchor seine, Scottish/Fly seine prohibited by NWSFC Byelaw 3.

Seabird assemblage	Intertidal rock, intertidal sand and muddy sand, intertidal mud, intertidal mixed sediment, coastal saltmarshes and saline reedbeds – (Saltmarsh), freshwater and coastal grazing marsh (Saltmarsh), coastal sand dunes (Sand dunes), Water column	Beam trawl (pulse/wing), Heavy otter trawl, Pair trawl, Anchor seine, Scottish/fly seine, Mid-water trawl (single), Mid-water trawl (pair), industrial trawls, Dredge (scallop), Dredge (mussel/clam/oyster), Dredge (pump scoop), Dredge (tractor), Dredge (suction), Cuttle pots, Fish traps, Longlines (pelagic), Purse seine, Fyke nets, Commercial diving, Bait dragging.	NO	Activity does not currently occur and has not recently occurred in European Site (IFCO local knowledge (S. Brown, Jan 2014)). Anchor seine, Scottish/Fly seine prohibited by NWSFC Byelaw 3.
Breeding waterbird assemblage	Intertidal rock, intertidal sand and muddy sand, intertidal mud, intertidal mixed sediment, coastal saltmarshes and saline reedbeds – (Saltmarsh), freshwater and coastal grazing marsh (Saltmarsh), coastal sand dunes (Sand dunes), Water column	Beam trawl (pulse/wing), Heavy otter trawl, Pair trawl, Anchor seine, Scottish/fly seine, Mid-water trawl (single), Mid-water trawl (pair), industrial trawls, Dredge (scallop), Dredge (mussel/clam/oyster), Dredge (pump scoop), Dredge (tractor), Dredge (suction), Cuttle pots, Fish traps, Longlines (pelagic), Purse seine, Fyke nets, Commercial diving, Bait dragging.	NO	Activity does not currently occur and has not recently occurred in European Site (IFCO local knowledge (S. Brown, Jan 2014)). Anchor seine, Scottish/Fly seine prohibited by NWSFC Byelaw 3.
Natterjack toad (NON MARINE)	Intertidal rock, intertidal sand and muddy sand, intertidal mud, intertidal mixed sediment, coastal saltmarshes and saline reedbeds – (Saltmarsh), freshwater and coastal grazing marsh (Saltmarsh), coastal sand dunes (Sand dunes), Water column	Beam trawl (pulse/wing), Heavy otter trawl, Pair trawl, Anchor seine, Scottish/fly seine, Mid-water trawl (single), Mid-water trawl (pair), industrial trawls, Dredge (scallop), Dredge (mussel/clam/oyster), Dredge (pump scoop), Dredge (tractor), Dredge (suction), Cuttle pots, Fish traps, Longlines (pelagic), Purse seine, Fyke nets, Commercial diving, Bait dragging.	NO	Activity does not currently occur and has not recently occurred in European Site (IFCO local knowledge (S. Brown, Jan 2014)). Anchor seine, Scottish/Fly seine prohibited by NWSFC Byelaw 3.

H2110. Embryonic shifting dunes		Beam trawl (pulse/wing), Heavy otter trawl, Pair trawl, Anchor seine, Scottish/fly seine, Mid-water trawl (single), Mid-water trawl (pair), industrial trawls, Dredge (scallop), Dredge (mussel/clam/oyster), Dredge (pump scoop), Dredge (tractor), Dredge (suction), Cuttle pots, Fish traps, Longlines (pelagic), Purse seine, Fyke nets, Commercial diving, Bait dragging.	NO	Activity does not currently occur and has not recently occurred in European Site (IFCO local knowledge (S. Brown, Jan 2014)). Anchor seine, Scottish/Fly seine prohibited by NWSFC Byelaw 3.
H2120. Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes"); Shifting dunes with marram		Beam trawl (pulse/wing), Heavy otter trawl, Pair trawl, Anchor seine, Scottish/fly seine, Mid-water trawl (single), Mid-water trawl (pair), industrial trawls, Dredge (scallop), Dredge (mussel/clam/oyster), Dredge (pump scoop), Dredge (tractor), Dredge (suction), Cuttle pots, Fish traps, Longlines (pelagic), Purse seine, Fyke nets, Commercial diving, Bait dragging.	NO	Activity does not currently occur and has not recently occurred in European Site (IFCO local knowledge (S. Brown, Jan 2014)). Anchor seine, Scottish/Fly seine prohibited by NWSFC Byelaw 3.
H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland*		Beam trawl (pulse/wing), Heavy otter trawl, Pair trawl, Anchor seine, Scottish/fly seine, Mid-water trawl (single), Mid-water trawl (pair), industrial trawls, Dredge (scallop), Dredge (mussel/clam/oyster), Dredge (pump scoop), Dredge (tractor), Dredge (suction), Cuttle pots, Fish traps, Longlines (pelagic), Purse seine, Fyke nets, Commercial diving, Bait dragging.	NO	Activity does not currently occur and has not recently occurred in European Site (IFCO local knowledge (S. Brown, Jan 2014)). Anchor seine, Scottish/Fly seine prohibited by NWSFC Byelaw 3.

<p>H2150. Atlantic decalcified fixed dunes (<i>Calluno-Ulicetea</i>); Coastal dune heathland*</p>		<p>Beam trawl (pulse/wing), Heavy otter trawl, Pair trawl, Anchor seine, Scottish/fly seine, Mid-water trawl (single), Mid-water trawl (pair), industrial trawls, Dredge (scallop), Dredge (mussel/clam/oyster), Dredge (pump scoop), Dredge (tractor), Dredge (suction), Cuttle pots, Fish traps, Longlines (pelagic), Purse seine, Fyke nets, Commercial diving, Bait dragging.</p>	<p>NO</p>	<p>Activity does not currently occur and has not recently occurred in European Site (IFCO local knowledge (S. Brown, Jan 2014)).</p> <p>Anchor seine, Scottish/Fly seine prohibited by NWSFC Byelaw 3.</p>
<p>H2170. Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>); Dunes with creeping willow</p>		<p>Beam trawl (pulse/wing), Heavy otter trawl, Pair trawl, Anchor seine, Scottish/fly seine, Mid-water trawl (single), Mid-water trawl (pair), industrial trawls, Dredge (scallop), Dredge (mussel/clam/oyster), Dredge (pump scoop), Dredge (tractor), Dredge (suction), Cuttle pots, Fish traps, Longlines (pelagic), Purse seine, Fyke nets, Commercial diving, Bait dragging.</p>	<p>NO</p>	<p>Activity does not currently occur and has not recently occurred in European Site (IFCO local knowledge (S. Brown, Jan 2014)).</p> <p>Anchor seine, Scottish/Fly seine prohibited by NWSFC Byelaw 3.</p>
<p>H2190. Humid dune slacks</p>		<p>Beam trawl (pulse/wing), Heavy otter trawl, Pair trawl, Anchor seine, Scottish/fly seine, Mid-water trawl (single), Mid-water trawl (pair), industrial trawls, Dredge (scallop), Dredge (mussel/clam/oyster), Dredge (pump scoop), Dredge (tractor), Dredge (suction), Cuttle pots, Fish traps, Longlines (pelagic), Purse seine, Fyke nets, Commercial diving, Bait dragging.</p>	<p>NO</p>	<p>Activity does not currently occur and has not recently occurred in European Site (IFCO local knowledge (S. Brown, Jan 2014)).</p> <p>Anchor seine, Scottish/Fly seine prohibited by NWSFC Byelaw 3.</p>

S1166. <i>Triturus cristatus</i> ; Great crested newt	Coastal sand dunes	Beam trawl (pulse/wing), Heavy otter trawl, Pair trawl, Anchor seine, Scottish/fly seine, Mid-water trawl (single), Mid-water trawl (pair), industrial trawls, Dredge (scallop), Dredge (mussel/clam/oyster), Dredge (pump scoop), Dredge (tractor), Dredge (suction), Cuttle pots, Fish traps, Longlines (pelagic), Purse seine, Fyke nets, Commercial diving, Bait dragging.	NO	Activity does not currently occur and has not recently occurred in European Site (IFCO local knowledge (S. Brown, Jan 2014)). Anchor seine, Scottish/Fly seine prohibited by NWSFC Byelaw 3.
S1395. <i>Petalophyllum ralfsii</i> ; Petalwort		Beam trawl (pulse/wing), Heavy otter trawl, Pair trawl, Anchor seine, Scottish/fly seine, Mid-water trawl (single), Mid-water trawl (pair), industrial trawls, Dredge (scallop), Dredge (mussel/clam/oyster), Dredge (pump scoop), Dredge (tractor), Dredge (suction), Cuttle pots, Fish traps, Longlines (pelagic), Purse seine, Fyke nets, Commercial diving, Bait dragging.	NO	Activity does not currently occur and has not recently occurred in European Site (IFCO local knowledge (S. Brown, Jan 2014)). Anchor seine, Scottish/Fly seine prohibited by NWSFC Byelaw 3.

3. Conclusion

Is the proposal likely to have a significant effect 'alone or in combination' on Ribble and Alt Estuary SPA? NO

4. Additional evidence documents

Steve Brown, NWIFCA (Jan 2014) **Fishing activity information from local IFCOs – Central District.**
Available on request.

[..\..\Activity information\Jan 2014-original versions from IFCOs\EMS FishingActivity_SBrown.xlsx](#)

Updated May 2015- [..\..\Activity information\Up to date IFCO spreadsheets\EMS FishingActivity_SBrown updated 29.05.15.xlsx](#)

NWIFCA (Jan 2014) **Ribble and Alt Estuary SPA Matrix with activities not occurring blanked out (3rd edit)**. *Available on request.*

(produced in conjunction with local IFCOs and agreed by Natural England)

[S:\Science\Fisheries_Management\MPA_DEFRA\NWIFCA\3rd_EDIT_UP_TO_DATE_EMS_site_specific_matrices \(Jan 15th 2014\)\NWIFCA_EMS_SITES_Ribble edited blacked out.xlsx](S:\Science\Fisheries_Management\MPA_DEFRA\NWIFCA\3rd_EDIT_UP_TO_DATE_EMS_site_specific_matrices_(Jan_15th_2014)\NWIFCA_EMS_SITES_Ribble_edited_blacked_out.xlsx)

Natural England European Site Conservation Objectives for Ribble and Alt Estuaries SPA (Published 30th June 2014). Available at: <http://publications.naturalengland.org.uk/publication/4868920422957056?category=4582026845880320>

Annex 2: Natural England's consultation advice

Date: 01 July 2015
Our ref: 156315
Your ref: Assessment of Fisheries Not Occuring



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BY EMAIL ONLY

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Dear Sarah,

Consultation: Formal Advice to North Western IFCA. Light Touch Assessments for North Western District Sites

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.

In 2012, the Department for Environment, Food and Rural Affairs (Defra) announced a revised approach to the management of commercial fisheries in European Marine Sites (EMS)¹. The objective of this revised approach is to ensure that all existing and potential commercial fishing activities are managed in accordance with Article 6 of the Habitats Directive. This document states that for 'amber' risk activities a site level assessment will be required to assess whether management of an activity is required to conserve site features. The Department's strong preference is that site level assessments be carried out in a manner that is consistent with the provisions of Article 6(3) of the Habitats Directive. Appropriate management measures should be put in place to ensure that the fishing activity or activities either 1) have no likely significant effect on a site in view of its conservation objectives or b) following assessment, can be concluded to have no adverse effect on the integrity of the site.

Natural England has considered the 12 Habitat Regulations Assessments (HRA) prepared by NW IFCA for the purposes of making an assessment consistent with the provisions of Article 6(3). Please accept this letter as Natural England's formal advice on those assessments including the conclusions reached in those assessments. Assessments have been made of the effects of activities not occurring within the following the listed sites or EMS's:

- NWIFCA-DE-EMS-001 – Dee Estuary EMS
- NWIFCA-DE-EMS-001A – Dee Estuary EMS
- NWIFCA-LD-SAC-001 – Shell Flat and Lune Deep SCI
- NWIFCA-LB-SPA-001 – Liverpool Bay/Bae Lerpwl SPA
- NWIFCA-DC-SAC-001 – Drigg Coast SAC
- NWIFCA-SF-EMS-001 – Solway Firth EMS
- NWIFCA-SF-EMS-001A – Solway Firth EMS

¹ Defra revised approach:

<https://www.gov.uk/government/publications/revised-approach-to-the-management-of-commercial-fisheries-in-european-marine-sites-overarching-policy-and-delivery>



Natural England is accredited to the Cabinet Office Service Excellence Standard

- NWIFCA-RA-SPA-001 – Ribble and Alt SPA
- NWIFCA-MN-SPA-00 – Mersey Narrows and North Wirral Foreshore SPA
- NWIFCA-ME-SPA-001 – Mersey Estuary SPA
- NWIFCA-MB-EMS-001 – Morecambe Bay EMS
- NWIFCA-MB-EMS-001A – Morecambe Bay EMS

We are content that the best available and most up to date evidence has been used to carry out the HRAs by NWIFCA officers, to determine whether management of an activity is required to conserve site features, and thus to ensure the protection of the features, from direct and indirect impacts from the collection of marine fisheries resources.

It is Natural England's view that through their 12 HRAs, North Western IFCA officers appear to have appropriately identified those activities that are not likely to have a significant effect in view of the site's conservation objectives.

It is Natural England's view that any foreseeable risk, or harm to the site has been appropriately assessed; and that there is a mechanism in place to allow assessments of fisheries if they are found to occur and to allow management to be implemented if needed.

Please do not hesitate to contact me if you have any questions or require further information.

Yours sincerely,



Helen Ake

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