

Consultation on sites proposed for designation as Highly Protected Marine Areas

28 September 2022

Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 65 organisations to use their strong joint voice for the protection of nature. Our members campaign to conserve, enhance and access our landscapes, animals, plants, habitats, rivers and seas. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline. This response is supported by the following Link member organisations:

- Institute of Fisheries Management
- ORCA
- RSPB
- Surfers Against Sewage
- Whale and Dolphin Conservation

Questions about all candidate HPMA sites

1. To what extent do you support or oppose the designation of pilot HPMA sites in English waters?

- Strongly support

As our seas become increasingly crowded with the growth of industries such as offshore renewables,¹ our fragile marine wildlife is affected by multiple pressures. We need to ensure there is space for nature within marine spatial prioritisation work - havens where wildlife can recover and thrive, without pressures from human activities; HPMA sites will be a vital tool for delivering this.

Decades of overexploitation and pollution have left our seas damaged and degraded and existing Marine Protected Areas (MPAs) are limited in their ability to restore nature (with many allowing damaging fishing activity and even offshore development). At present, there are only an extremely limited number of small 'No Take Zones', which prohibit all methods of fishing (but not all extractive activities). In England, these are at Flamborough Head, Lundy Island and the Medway Estuary and cover areas of 1km², 3.3km² and 12.1km² respectively. These sites are located away from significant commercial fishing pressure. To date there are no areas of English waters fully protected from all extractive or damaging human activities.

¹ About 12 gigawatts (GW) of offshore wind is currently installed in the UK. The Government's ambition is for offshore wind to produce 50 GW by 2030 (40 GW target). The Climate Change Committee estimates that we need up to 140 GW by 2050 to meet net zero (over 10 times the current capacity).

Furthermore, very few MPAs are adequately managed and monitored. Successful HPMA will allow us to see what true recovery at sea looks like. They will set a new bar from which other protected areas can and should be measured against in the future. Marine recovery within HPMA will have multiple benefits for wildlife, people and the climate, helping achieve wider Government objectives including:

- **Increase the carbon sequestration and storage potential of our seas and coastal habitats:** Climate Change Act (2008): net-zero greenhouse gas emissions by 2050
- **Enhance and protect marine biodiversity:** UK Marine Strategy Regulations (2010): Goal to achieve or maintain Good Environmental Status in UK seas; Environment Act (2021): halt species decline by 2030; 25 Year Environment Plan: leave nature in a better state than we found it
- **Improve long/medium-term opportunities for the fishing sector:** Levelling Up agenda; Fisheries Act (2020): sustainability objective; ecosystem objective

We welcome that the proposed HPMA will provide a higher level of protection than other types of MPA, allowing marine areas to return to as natural a state as possible. We believe that effective protection entails stronger action than is currently delivered through the domestic MPA network.

While we strongly support the programme, we hope that the Government will acknowledge displacement of all fishing activity in its decision making and put strategies in place to support marine users and avoid creating new problems from moving pressures to other parts of the marine environment. This must involve a review of whether there is too much capacity in the fishing fleet (i.e it is too large) given the Government's plans for offshore renewables, nature protection and other uses of the sea.

Further, we would note that HPMA work best when they cover a large area and form part of a larger network of MPAs. Sites allowing multiple uses currently make up the vast majority of MPAs in English waters. But it is simply not enough to consider multiple use MPAs as adequate protection for marine biodiversity in themselves - we also require substantial areas of ocean to be effectively 'off limits' to any destructive or invasive human activity. HPMA have an important role to play in achieving the Government's goal for 30x30; protecting 30% of the marine environment by 2030. Our recent assessment found that the vast majority of the MPA network should not currently count towards the 30%.² To achieve 30x30, at least 30% of England's seas should be either within properly designed and managed HPMA or licensed to allow only extremely limited activity, within the context of wider ecologically coherent networks. As an absolute minimum, at least a third of the 30% of English seas protected for nature should be designated as HPMA. This is a practical and achievable goal; indeed Scotland has committed that 10% of Scottish seas are to be designated as HPMA.

So, designation of pilot sites (which, if all 5 are designated, will cover just 0.5% of English seas) must be quickly followed by a scaling up of HPMA designations across English seas to

² https://www.wcl.org.uk/docs/assets/uploads/WCL_30x30_in_the_Marine_Environment.pdf

effectively deliver 30x30 commitments. At present, the lack of any Government commitment to expand the programme beyond these pilot sites is limiting the public and stakeholders' understanding of the vision of the programme and what 'pilot sites' are actually piloting.

2. What effect do you believe HPMA's will have on the following uses and values of the marine environment?

Please tick your preferred option.

	Strong Negative	Negative	Neutral	Positive	Strong Positive	Don't know
Recreation and tourism (including recreational boating, recreational sea fishing and tourism businesses)					X	
Culture and heritage (including community identity, unique or					X	

culturally important marine activities)						
Health and wellbeing (including mental and physical health, health and safety)					X	
Industry (including displacement of fishing or other marine industry impacts)				X		
Local economy (including community livelihoods and employment)					X	
Opportunities for education and research					X	
Other (please state)						

Recreation and tourism/ Local economy

- HPMA's have huge potential to boost wildlife tourism in a local area. In a normal year, coastal tourism in Great Britain is estimated to generate £17.1bn in spending, supporting 285,000 tourism related jobs³ (by comparison Seafish has estimated that 2,481 Full Time Equivalent jobs were generated by fishing vessels in England in 2020⁴). Tourism jobs are a vital source of employment in many coastal towns, which often suffer from high levels of deprivation and unemployment. For many of the 27m overnight visitors, and 217m day visitors to the coast each year,⁵ a key attraction is the opportunity to connect with the marine environment. Indeed, a 2016 Government report on coastal communities noted that 79 million people take a trip to the countryside or coasts to watch wildlife every year, demonstrating the widespread appeal of these trips in the UK.⁶ The importance of wildlife tourism is supported by survey evidence. Polling undertaken by YouGov asked people why they valued visiting the UK's coast. They found that 39% of respondents highlighted 'getting close to nature and wildlife'.⁷

³ <https://coastaltourismacademy.co.uk/coastal-tourism>

⁴ <https://www.seafish.org/document/?id=d9e7982d-e374-4de7-85a4-ca80c35f5666>

⁵ <https://coastaltourismacademy.co.uk/coastal-tourism>

⁶ p.42

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/603450/CCF_Report_2016.pdf

⁷ See https://www.wcl.org.uk/docs/assets/uploads/WCL_Seal_Tourism_Briefing.pdf

- Another survey undertaken by Visit Britain (a public body funded by the Department for Digital, Culture, Media & Sport) found that 71% of respondents listed watching wildlife as either the sole, a very or a fairly important reason for taking a recent trip. For 9% of people, watching wildlife was stated as the sole reason for undertaking their most recent UK holiday or short break.⁸ HPMA's can offer visitors a unique opportunity to connect with areas of flourishing marine life.

Culture and heritage

- We note the relevant section on culture and heritage from the Government commissioned Benyon Review which found:
 - *“Aesthetic, cultural and spiritual values are also associated with marine environments. The high level of protection afforded by HPMA's, allowing for the recovery of marine ecosystems, could increase the appreciation and enjoyment of the beauty of such environments, and could strengthen the positive emotional responses connected with sites of cultural and religious significance. More than two-thirds (67.9%) of respondents to the Call for Evidence agreed that HPMA's should be introduced “to support or improve opportunities for cultural, spiritual, educational and/or recreational activities”⁹*
- And on non-use and intrinsic values, which found:
 - *“The socio-cultural value of MPAs does not all come from direct use or visitation of the area. It is often argued that people derive well-being from knowing that protection is in place for marine and coastal environments, for current and future generations, and such values have often been referred to as ‘non-use’, ‘existence’ or ‘bequest’ values. Alternatively, such positive feelings are expressed in terms of obligation – a sense that protecting the environment is the right thing to do because it fulfils a duty. This sense of obligation was clearly reflected in the Call for Evidence, where a very high proportion (90.4%) of respondents agreed that HPMA's should be introduced “to look after our seas as part of our duty as stewards of the natural environment”. Important arguments have also been made about innate or intrinsic value. This was defined in the Millennium Ecosystem Assessment as “the value of something in and for itself, irrespective of its utility for someone else”. While some dispute that intrinsic values can meaningfully be quantified in terms of utility, such values have undoubtedly been important motivators of conservation. However characterised, they contribute to the case for HPMA's, including those that are remote and therefore difficult for people to access or use.*

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https://www.visitbritain.org/sites/default/files/vb-corporate/Documents-Library/documents/England-documents/valuing_activities_-_final_report_fv_7th_october_2015_0.pdf

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/890484/hpma-review-final-report.pdf

Experience suggests that engagement efforts, including communication, interpretation, exhibitions, film, educational opportunities and citizen science have the potential significantly to enhance human well-being associated with the aesthetic, cultural, spiritual and intrinsic values of protected areas like HPMAs.”

Health and Wellbeing

- The Chief Medical Officer’s 2021 report on health in coastal communities found that they “have some of the worst health outcomes in England, with low life expectancy and high rates of many major diseases”. He recommended that the Government should be “making more of the potential health and wellbeing benefits of living in coastal communities”.¹⁰ It is in this context that HPMAs could contribute to tackling poor health.
- Primarily for inshore HPMAs, there is the potential for increased participation in non-damaging activities such as non-motorized water sports like swimming, scuba diving, and kayaking. Indeed, at Lamlash Bay, Isle of Arran COAST note that “many divers and snorkellers come to carefully explore the recovery of the Lamlash Bay No Take Zone”. Research in the Mediterranean has found that these activities in MPAs have positive outcomes for participants’ physical and mental health.¹¹
- The designation of HPMAs will provide opportunities for citizen science and a greater connection between communities and the ocean. One study found that, for volunteers in Australia, engagement in marine monitoring programs “made them feel good emotionally and mentally, with active learning, such as remembering names of marine biota, stimulating brain activity and memory. Volunteer monitoring efforts generated personal satisfaction through their contributions, feelings of enjoyment, and socialising with others.” The volunteers were found to “want to protect and conserve the marine environment through positive behaviour change. By understanding and having a sense of meaning towards the marine environment, the volunteers felt a sense of pride in themselves.”¹²

Industry

- As HPMAs conserve wildlife and habitats on a large scale, the number, diversity and size of fish will increase. Neighbouring fisheries will benefit as commercially and recreationally fished species spillover into surrounding waters, helping restock our overfished seas.¹³ For this reason, HPMAs should not be seen as standing in

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005217/cmo-annual_report-2021-health-in-coastal-communities-summary-and-recommendations-accessible.pdf

¹¹ <https://www.tandfonline.com/doi/abs/10.1080/11745398.2021.2015412>

¹² <https://www.sciencedirect.com/science/article/abs/pii/S0964569110000785>

¹³ The Benyon Review highlighted that “The Cefas ‘Review of Highly Protected Marine Areas found evidence of spillover effects from the increased internal biomass. These effects may benefit fisheries and the marine ecosystem outside the HPMA. There is evidence that the reliability and volume of catches may increase for vessels fishing very close to a no-take boundary”

opposition to a flourishing fisheries sector, but rather as complementary, helping ensure the health of our seas for generations to come. Benefits of no-take zones have been seen in Scotland in Lamlash Bay where studies have shown that marine life has flourished since the establishment of Scotland's first no-take zone. Some species are reported to have increased by nearly 400% since protection measures were introduced, with benefits for exploited fish stocks. The designation of Lyme Bay in southwest England as an MPA added £2 million to the total value of tourism and recreation in the area¹⁴ and the restriction of bottom-towed fishing gear has seen an increase in the number of exploited fish by 430% and total abundance by 370%, inside the MPA over 11 years.¹⁵ We acknowledge that some fishers who use the proposed sites may be impacted as they have to fish elsewhere or find alternative sources of income, and urge Defra to acknowledge and support these individuals. A fair system will help aid compliance with management measures. While Defra have stated that they are looking to offer financial support for those affected by HPMA's, details of these proposals have not been fully outlined.

- One of the problems with the current pilot site process has been the poor data on current uses of the sites. Indeed, stakeholder sessions have revealed that data on fishing activity in certain sites is highly contested by local stakeholders, with Defra admitting that the 'macro data' they are using is likely not capturing the reality at sea.¹⁶ A lack of clear information of current fishing activity harms both stakeholder good-will, and the understanding of the impact of HPMA's on displacement and the necessary policies needed to address this. We believe that the slashing of capacity in the Environment Agency and Natural England over many years is partly responsible for a lack of on-the-ground knowledge of the sites which could have avoided these problems.
- We have selected 'positive' impact on industry rather than a higher rating as there may be short-term impacts on some fishers. We note that the Benyon Review called for 'action plans' to address the impact of HPMA's on small scale coastal fishers, which have not been delivered:
 - *"Government should balance the need for HPMA's in inshore waters with an action plan supporting social, economic and environmental development of coastal communities. This plan should contain specific actions to support the financial resilience and business success of small-scale coastal fishers and other small businesses."*

Education and research

- The Isle of Arran COAST group, which has achieved the establishment and ongoing management of Scotland's only No Take Zone at Lamlash Bay, has shown how an

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/890484/hpma-review-final-report.pdf

¹⁴ Rees et al., 2015 - The socio-economic effects of a Marine Protected Area on the ecosystem service of leisure and recreation: <https://doi.org/10.1016/j.marpol.2015.09.011>

¹⁵ Davies et al., 2021 - Ecosystem Approach to Fisheries Management works—How switching from mobile to static fishing gear improves populations of fished and non-fished species inside a marine-protected area <https://doi.org/10.1111/1365-2664.13986>

¹⁶ Defra HPMA stakeholder sessions w/c 22nd August

effective MPA and an engaged community can deliver huge educational and research benefits. The Discovery Centre on Arran is Scotland's first MPA visitor centre which aims to "educate the new generation and offer educational activities".¹⁷ The group is also committed to providing "lessons to school and activity groups of all ages and stages to show them the wonders of the marine world, raise awareness of environmental issues and prove how we can help overcome these."

- There is the potential for English HPMA's to benefit from the recent development of collaborative citizen science survey exercises and other public led initiatives. With modest funding support these could develop further into a very effective augmentation of the regulator driven survey programmes, particularly with reference to early life stages of commercial and noncommercial species in intertidal habitats existing within estuaries, saltmarshes and embayments, as well as surveys of seabirds and marine mammals. Experience has shown that such citizen science programmes can provide valuable scientific data at low cost, with the additional benefit of drawing the volunteers into supporting and engagement over future management regimes. There are often consequential additional social benefits around community engagement around health, exercise and environmental education.
- More generally, HPMA's will help us learn how our seas recover when pressures are removed.

Site Selection

Five candidate HPMA sites are being proposed as part of this consultation and you have the option to answer specific questions for each site. There will be an option to select 'yes', or 'no' for if you wish to answer the set of questions for each site. If 'yes' is selected, the set of specific questions for that site will appear. If 'no' is selected, you will skip to the next site. The sites will appear in the following order: Allonby Bay Dolphin Head Inner Silver Pit South Lindisfarne North-east of Farnes Deep

We have answered this question with our views on the overall site selection process.

Earlier this year Link published "The road to success for new Highly Protected Marine Areas"¹⁸, setting out the criteria for effectively delivering the programme. The following section compares our initial criteria (in bullet points and italicised) against what has been proposed in this consultation to evaluate the current proposals:

- *While consideration of **socio-economic factors** is important for the designation, management and enforcement processes of the HPMA introduction, as it was for Marine Conservation Zones, the primary basis on which HPMA site selection should be made must be science-led and based on ecological and conservation evidence and principles. Where socio-economic factors are considered, assessments must*

¹⁷ <https://www.arrancoast.com/education-octopus-centre/>

¹⁸ <https://www.wcl.org.uk/docs/Link%20-%20HPMA%20briefing%202022.pdf>

factor in both the positive socio-economic outcomes of HPMA s (increased wildlife tourism, spillover effects for fishing etc) as well as negative ones.

Verdict: We are concerned that, of the 30 sites identified by NE and JNCC based on ecological criteria, only 5 sites are now being put forward and these have been chosen based on which have the least impact on the fishing industry. Indeed the consultation document notes that “We have used data on fishing to remove the areas with the highest impact on fishers.” This undermines the primacy of ecological and conservation criteria and makes no consideration of the positive socio-economic outcomes that can be expected from HPMA s, which we have outlined in the above section.

- *HPMA s must be sufficient in size and number, in each regional sea, in inshore, nearshore and offshore English waters, so they encompass a range of habitats allowing us to study how different ecosystems recover when pressures are reduced. A lack of significant evidence should not be used as an excuse for not designating sites which have significant ecological merit. Pilot sites should include blue carbon habitats in recognition of the potential of these ecosystems to store and sequester carbon.*

Verdict: We are extremely concerned that the consultation document suggests that not all 5 sites may be brought forward, stating that the Government “are consulting on five candidate HPMA s and propose to designate a number of these as pilot HPMA s within a year of this consultation”. Any less than 5 sites would not deliver the recommendations of the initial Benyon Review.

We are also concerned that there are currently no HPMA s proposed for the South West.

On blue carbon, however, we welcome the inclusion of sites with blue carbon and, going forward, would highlight the North Sea carbon mapping work by WWF/RSPB/TWT/BMF¹⁹ which will be useful to inform future thinking.

- *The currently outlined minimum size of 5km in diameter for a HPMA is not large enough to realise the full benefits of new protections and if the longlist of sites includes much larger sites these should not be the first to be struck off when applying the socio economic criteria.*

Verdict: The sites selected are all larger than this which is welcome. Lindisfarne is 129km², Inner Silver Pit South is 62.5km², Dolphin Head is 508km², Allonby Bay is 38.5km², North East of Farnes Deep is 491.8km². We are encouraged that the sites selected go beyond the smallest size available. Although the exact boundaries may be refined after the consultation process, Defra should endeavour to ensure the HPMA s are as large as possible to deliver the greatest benefits.

- *HPMA s must take a whole-site approach, protecting all the wildlife and habitats within their boundaries with effective management measures. A buffer-zone should*

¹⁹ <https://www.blumarinefoundation.com/2021/11/08/north-sea-blue-carbon-report/>

be incorporated around their boundaries to avoid impacts from neighbouring activities affecting their success.

Verdict: We welcome that the proposed HPMA will take a whole-site approach and that a buffer zone is proposed for angling.

- *The positive benefits of HPMA should be actively communicated by the Government. While Link members are supportive of the HPMA process and happy to support the programme where possible, the Government must also make the public case that greater coastal and offshore marine protections have multiple benefits for coastal communities.*

Verdict: We welcome that there have been community meetings and other stakeholder engagement sessions regarding HPMA which have included explanations of the ecological benefits of HPMA by JNCC and NE.

However, we are concerned that the multiple social and economic benefits of marine protections for coastal communities (in addition to the ecosystem services value) haven't been effectively conveyed to stakeholders. Further, the leaking of pilot site locations before communicating these with those impacted has needlessly squandered possible good-will in some instances.

We believe that overall, a possible way forward for future sites is a more robust consultation framework for inshore sites (possibly modelled on previous estuary and coastal management partnership experience), to find a workable way to engage and gain local community support at an earlier stage of the designation process. This will require greater resources than the current consultation has committed, working with communities for extended periods of time to ensure buy-in to the changes.