UK CHAMBER of SHIPPING

30 Park Street
London
SE1 9EQ

MCZ Team,
C/O Post Room,
Nobel House,
17 Smith Square,
London, SW1P 3JR

By email to: MCZ@defra.gsi.gov.uk

alester@ukchamberofshipping.com
020 7417 2841

28 March, 2013

UK Chamber of Shipping Response to
Marine Conservation Zones: Consultation on proposals for designation in 2013

Dear Sir/Madam,

The UK Chamber of Shipping welcomes this consultation on the first tranche of Marine Conservation Zones for designation. We support the MCZ process and have been engaged with it throughout, with representation at all four regional projects. The UK Chamber very much appreciates the phased approach being taken, which we consider makes much more manageable the task of considering and implementing the MCZ's for regulators and stakeholders alike. This is especially useful given the clarification that sites for future consultation would not be treated as a material consideration for license applications. Furthermore, we hope that further designations beyond this point will be undertaken in the context of marine plans, as the planning process takes place around the country, rather than pre-empting those plans.

Our ability to comment in detail on these proposals has been significantly limited by a lack of information on the implementation of proposed MCZ's, with regard to management measures, restriction of activities and enforcement measures. Those details have been repeatedly promised to stakeholders throughout the duration of England's four regional projects and beyond, and without them a quantitative evaluation of the impacts on industry, or any assessment of the social and environmental consequences of an MCZ is impossible.

Nonetheless, having been involved in the regional projects, our understanding is that surface navigation activity would not be restricted and neither, in most cases, would access to and ongoing operation of existing port facilities. Our comments on each site reflect that expectation.

Although no quantitative assessment is possible for the reasons outlined above and our colleagues in the ports' associations could comment more accurately on these issues, the UK Chamber does have doubts regarding the projected scale of costs put forward for some proposed MCZ's, especially where impact assessment burdens for licensing are concerned. The small scale of these figures seems unlikely to us and we would feel that either no cost at all or one of much greater significance would be more realistic outcomes.

The Chamber of Shipping Ltd. No 2107383. Reg. in England at above office address.

It is noted that the format of position information for the sites is not consistent throughout the consultation documents and in some cases is incorrect (e.g. West and East being confused in the longitude). Consultation on future tranches would be easier to respond to if correct and consistent decimal degrees, positive to the north and east were used.

At Annex A are our responses to each individual site, where question numbers refer to the questions in the consultation document.

Yours faithfully,

Adrian Lester
Manager – Marine, Environment & Offshore

Stour & Orwell		
Project: Balanced Seas	**Locality:** Stour & Orwell	**Lat:** 55.769º N **Lon:** 14.564º E
Q1: We find this site acceptable for designation in the first tranche on the basis that management measures and implementation will allow the continuation of current surface navigation, port and harbour activity.		

Blackwater, Crouch, Roach & Colne Estuaries		
Project: Balanced Seas	**Locality:** Blackwater	**Lat:** 51.721º N **Lon:** 0.972º E
Q1: We find this site acceptable on the basis of management measures and implementation which will allow the continuation of current surface navigation, coastal shipping and recreational activity.		

Medway estuary		
Project: Balanced Seas	**Locality:** Gillingham	**Lat:** 51.415º N **Lon:** 0.653º E
Q1: We find this site acceptable on the basis of management measures and implementation allowing the continuation of current port activity. **Q9:** We are concerned that should restrictions be placed on maintenance dredging for port facilities, this could harm maritime transport and the local economy, as a result enhancing an ecologically insensitive move to road transport.		

Thanet Coast		
Project: Balanced Seas	**Locality:** Thanet	**Lat:** 51.378º N **Lon:** 1.379º E
Q1: We find this site acceptable on the basis of management measures and implementation allowing the continuation of current port activity and surface navigation.		

Folkestone Pomerania		
Project: Balanced Seas	**Locality:** Eastern English Channel	**Lat:** 51.022º N **Lon:** 1.279º E
Proposed response: **Q1:** We agree with this site on basis that surface navigation will be unaffected.		

Hythe Bay		
Project: Balanced Seas	**Locality:** Hythe (Nr. Folkestone)	**Lat:** 51.041º N **Lon:** 1.085º E
Q1: We agree with this site.		

Beachy Head West		
Project: Balanced Seas	**Locality:** Brighton to Eastbourne	**Lat:** 50.772º N **Lon:** 0.064º E
Q1: We find this site acceptable on condition that restrictions to passage, dredging and maintenance of navigational aids around the entrance to Newhaven are not applied. **Q4:** We strongly urge that the entrance to Newhaven be excluded from the MCZ for absolute clarity about port maintenance activities. Should restrictions be placed on maintenance dredging for port facilities, this could harm maritime transport and the local economy, as a result enhancing an ecologically insensitive move to road transport.		

Kingmere		
Project: Balanced Seas	**Locality:** SW of Worthing	**Lat:** 50.728º N **Lon:** 0.465º W
Q1: We agree with this site.		

Pagham Harbour		
Project: Balanced Seas	**Locality:** Pagham	**Lat:** 50.763º N **Lon:** 0.765º W
Q1: We agree with this site while noting concerns about coastal defence and urging that to be allowed to continue in the most ecologically sensitive manner which fulfils the need.		

Cumbria Coast		
Project: Irish Sea Conservation Zones	**Locality:** South of Whitehaven	**Lat:** 54.458º N **Lon:** 3.570º W
Q1: We agree with this site.		

Fylde offshore		
Project: Irish Sea Conservation Zones	**Locality:** Blackpool	**Lat:** 53.747º N **Lon:** 3.220º W
Q1: We accept the case for this site.		

Hilbre Island Group		
Project: Irish Sea Conservation Zones	**Locality:** West Kilby	**Lat:** 53.377º N **Lon:** 3.217º W
Q1: We agree with this site.		

North of Celtic Deep		
Project: Irish Sea Conservation Zones	**Locality:** Southern Irish Sea	**Lat:** 52.090º N **Lon:** 5.646º W
Q1: We agree with this site on condition that surface navigation will not be restricted.		

Aln Estuary		
Project: Net Gain	**Locality:** River Aln	**Lat:** 55.389º N **Lon:** 1.618º E
Q1: We agree with this site.		

Swallow Sand		
Project: Net Gain	**Locality:** Western North Sea	**Lat:** 55.750º N **Lon:** 0.661º E
Q1: We agree with this site on condition that surface navigation will not be restricted.		

Rock Unique		
Project: Net Gain	**Locality:** Western North Sea	**Lat:** 55.757º N **Lon:** 0.613º E
Q1: We agree with this site on condition that surface navigation will not be restricted.		

Upper Fowey and Pont Pill		
Project: Finding Sanctuary	**Locality:** Upper Fowey estuary	**Lat:** 50.370º N **Lon:** 4.639º W
Q1: We accept this site on condition that access to the river and terminals therein is not impeded.		

Whitsand and Looe Bay		
Project: Finding Sanctuary	**Locality:** Whitsand Bay	**Lat:** 50.343º N **Lon:** 4.345º W
Q1: We accept this site on condition that access to port facilities is not impeded.		

Tamar Estuary		
Project: Finding Sanctuary	**Locality:** Inner reaches of Plymouth harbour & tributaries	**Lat:** 50.424º N **Lon:** 4.221º W
Q1: We accept this site on condition that surface passage is not impeded.		

Skerries bank and surround		
Project: Finding Sanctuary	**Locality:** SE of Start Point	**Lat:** 50.195º N **Lon:** 1.886º W
Q1: We agree with this site.		

Torbay		
Project: Finding Sanctuary	**Locality:** Torbay	**Lat:** 50.195º N **Lon:** 1.886º W
Q1: We accept this site on condition that access to existing port/harbour facilities remains unimpeded, noting additional costs which are likely to be generated for local ports and suggesting that these be minimised where possible.		

Chesil Beach and Stennis Ledges		
Project: Finding Sanctuary	**Locality:** West of Chesil Beach	**Lat:** 50.635º N **Lon:** 3.309º W
Q1: We agree with this site.		

South Dorset		
Project: Finding Sanctuary	**Locality:** Weymouth Bay	**Lat:** 50.386º N **Lon:** 2.214º W
Q1: We accept this site on condition that surface passage is not impeded.		

Poole Rocks		
Project: Finding Sanctuary	**Locality:** Poole Bay	**Lat:** 50.687º N **Lon:** 1.886º W
Proposed response: **Q1:** We accept this site on condition that access to Poole harbour, and placement and maintenance of navigational aids are unimpaired. **Q9:** To interfere with the maintenance of safe passage, including navigational aids in this area would be likely to have a detrimental and unacceptable effect on navigational safety in an area the socio-economic and environmental importance of which is recognised.		

East of Haig Fras		
Project: Finding Sanctuary	**Locality:** NW of Lands' End	**Lat:** 50.499º N **Lon:** 6.654º W
Q1: We agree with this site on condition that surface passage is not impeded.		

South-West Deeps		
Project: Finding Sanctuary	**Locality:** Celtic Sea	**Lat:** 49.144º N **Lon:** 9.050º W
Q1: We agree with this site on condition that surface passage is not impeded.		

The Canyons		
Project: Finding Sanctuary	**Locality:** North Atlantic (SW approaches)	**Lat:** 48.333º N **Lon:** 9.680º W
Q1: We agree with this site on condition that surface passage is not impeded.		

Lundy		
Project: Finding Sanctuary	**Locality:** Bristol Channel	**Lat:** 51 184º N **Lon:** 4.669º W
Q1: We agree with this site.		

Padstow Bay and Surrounds		
Project: Finding Sanctuary	**Locality:** North Cornwall	**Lat:** 50.548º N **Lon:** 5.057º W
Q1: We can accept this site.		

Isles of Scilly (all 11 separate sites)		
Project: Finding Sanctuary	**Locality:** Isles of Scilly	
Q1: We agree with this site on condition that surface passage is not impeded.		

The Manacles		
Project: Finding Sanctuary	**Locality:** South of Falmouth	**Lat:** 50.111º N Lon: 5.470º W
Q1: We can accept this site on condition that surface passage is not impeded.		