Environment and Sustainability Committee

Marine Policy in Wales

MP 05 Welsh Sports Association

wsa:
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gwasanaethu chwaraeon cymru

Marine Policy in Wales

The National Assembly for Wales Environment and Sustainability Committee is consulting in regard to marine policy in Wales with reference to progress made by the Welsh Government in respect of the Marine Act 2009 – particularly in relation to marine conservation and marine spatial planning powers

The Welsh Sports Association

The Welsh Sports Association (WSA) is the recognised independent voice for sport, physical recreation and outdoor pursuits in Wales Since its foundation in 1972 the WSA has been the 'umbrella' organisation for National Governing Bodies (NGBs) in Wales, providing them with representation and support. Currently around 70 NGBs are members of the WSA with an estimated 500,000 plus individual members under their banner. As well as being the voice for the sector the WSA offers a wide range of services to its members including guidance, training, information, governance support, financial management, development support and other services.

We are all concerned to promote a more active lifestyle for our citizens. The benefits in terms of health and well-being, the economy and in regard to other agendas are well known and need not be expanded upon here.

WSA has had access to a copy of the response to this consultation lodged by the RYA dated 30 July 2012 a copy of which is appended to paper. WSA supports the views expressed.

Whilst not having the technical knowledge of the RYA in this area the WSA is clearly concerned in regard to all policies which may have the effect of reducing opportunities for use of our natural environment for sport and physical recreation. We naturally recognise that our environment must be protected and that sporting use must be both responsibly managed and compatible with environmental safeguards. However in our view rules which restrict access

should only be applied where they are clearly absolutely necessary to achieve such protection.

Philip Avery (WSA)
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By e-mail

30th July 2012

Dear Sirs,

Re: Marine Conservation Zones (MCZs) Potential Site Options for Welsh Waters

We refer to the Welsh Government's (WG) consultation in relation to the above. We set out below our response to the consultation paper.

The RYA is the national body for all forms of recreational and competitive boating. It represents dinghy and yacht racing, motor and sail cruising, RIBs and sportsboats, powerboat racing, windsurfing, inland cruising and personal watercraft. The RYA manages the British sailing team and Great Britain was the top sailing nation at the 2000, 2004 and 2008 Olympic Games.

The Welsh Yachting Association (WYA) is established to promote the sport of sailing, windsurfing and power boating in Wales and acts as the RYA Council for Wales. The WYA represents 85 affiliated member clubs and 64 registered Training Centres together with an estimated 25,000 participants in the sport in Wales. It is grant aided by Sports Wales and works closely with the National Watersports Centre in Plas Menai.

General Comments

The RYA and WYA acknowledge the Welsh Government's (WG) commitment to the vision for 'clean, healthy, safe, productive and biologically diverse seas' and endorses this view. We are supportive of the WG's stated aim to maintain, improve and develop Wales' natural resources, to deliver benefit to the environment, people and economy of Wales now and in the future. We have already provided comments on the WG's consultations in relation to marine licensing and marine planning in Wales, and also in reference to the holistic approach laid out in *A Living Wales*. The RYA's and WYA's position on such matters is therefore known to the Marine Branch of WG and the comments provided in this letter should be taken within the wider context of our previous submissions. In addition, the RYA has produced a

position statement in relation to marine protected areas, a copy of which is included with this letter.

The RYA and WYA concur that the success of natural resource management should be judged by 'improved outcomes for our environment, our people and our economy'. Such an integrated approach is consistent with the WG's commitment to sustainable development however, it is it is not clear at this time how this will be achieved having regard to *Catching the Wave* (2004) the existing activity tourism strategy for watersports, *Making the Most of Wales's Coast* (2007) the Integrated Coastal Zone Management Strategy for Wales and *Coastal Tourism Strategy* (2008). We also have concerns that MCZs are being identified before marine plans have been drawn up and agreed. There is the opportunity with marine plans to look at the totality of the activities underway on the coast and produce new data about their impact and the effect of existing designations. Under current arrangements there is the strong risk of identifying MCZs in isolation from new coastal data which marine plans will produce.

The RYA's and the WYA's primary objectives of engaging in the consultation process regarding the development of HPMCZs are to protect the public right of navigation and to ensure, as far as possible, that recreational boating interests are not adversely affected by the designation of such HPMCZs. We are particularly concerned therefore by the implication that the right to make passage through an HPMCZ may be compromised. The answer to FAQ C7 states 'Navigation through sites should be able to continue…' however Box 1 in Part 4 of the consultation document includes 'navigation and transit of vessels' as a potentially damaging or disturbing activity that may be excluded. We would like to take this opportunity to remind WG of the United Nations Convention on the Law of the Sea (UNCLOS 1982) to which the UK is a signatory. This establishes the right of 'innocent passage' in territorial waters. Furthermore, the public right of navigation in tidal waters has existed in Britain since before Magna Carta. The proposals to exclude transiting vessels from within HPMCZs appear to be in conflict with this and UNCLOS. The lack of clarity on this particular matter has been the cause of much concern amongst the boating public and we would encourage WG to provide transparency over this issue as soon as possible.

We are also greatly concerned by the fact that 'the installation of navigational aids will be incompatible with the conservation objectives of a HPMCZ and therefore would not be allowed'. Navigational aids are installed for the safety of all mariners and are essential to safe navigation in UK waters. In the busy north Menai Strait, for example, they delineate the safe channel between Dinmor Bank and Ten Feet Bank, through Puffin Sound and into the Strait, helping mariners to avoid the dangers of the Lavan Sands and the Hoveringham wreck; it is likely that their absence would place lives in real danger. Trinity House as the General Lighthouse Authority (GLA) is primarily responsible for installing navigation aids and takes decisions about where they should be located following consultation with the Maritime and Coastguard Agency (MCA), the RYA and others. It is our understanding that only those aids that are essential for safety purposes are installed. The RYA and WYA would object to the deployment of navigational safety aids being determined on ecological grounds and would encourage WG to revisit this matter. We understand from discussions with WG officials that it is not the intention of WG to remove existing navigational aids however we would point out that this is not clear in your consultation document and seek confirmation that this is indeed the case. In any case, existing navigation aids require regular maintenance

and eventual replacement and it appears that this activity would equally be restricted under the present proposals.

It is clear from the proposals laid out in this consultation document that it is the intention of WG to prohibit anchoring within HPMCZs as this activity is seen as being 'incompatible with the conservation objectives'. As mentioned above, the public rights to navigation in tidal waters have existed in Britain since before Magna Carta and this includes the incidental activity of anchoring. We understand that there may be circumstances in which restrictions on anchoring may be proposed and we would like to draw your attention to the relevant section of the RYA's position statement on MCZs which states:

In areas where restrictions on anchoring are proposed, the RYA's policy position is that such restrictions:

- should only be introduced if sound scientific evidence confirms that a particular protected feature and vessel anchoring cannot reasonably co-exist in a particular area.
- should be confined to the specific parts of an MCZ/MPA in which anchoring and the protected habitat or wildlife feature cannot reasonably co-exist.
- should not be imposed unless it can be demonstrated that the relevant habitat and/or wildlife feature is present in the area to be protected, and that such a restriction will be effective in protecting it.
- should not be imposed unless it can be demonstrated that such a restriction will be enforceable and enforced.
- should not be imposed unless the area in which it is to be applied is properly marked on navigational charts and/or by physical marking such as buoyage
- should not be imposed unless appropriate alternative facilities or management measures are available or made available in the locality in which the restriction is to be applied.

The RYA and WYA will continue to object to bans on anchoring unless we are confident that the points above have been addressed. While understanding that the Marine and Coastal Access Act 2009 includes a provision that allows anchoring in HPMCZs in circumstances when there is a danger to life, good seamanship often involves taking measures including anchoring before there is a danger to life, for example to free a fouled propeller or to avoid running onto rocks; restrictions on anchoring may well result in delayed respite and riskier decision making.

We understand that having presented 10 potential sites as options for further consideration WG intends to designate no more than 3 or 4 sites. Whilst we welcome the fact that the restrictions associated with HPMCZs will only cover 3 or 4 areas, we are concerned that a socio-economic impact assessment will only be undertaken at a later stage once the 3 or 4 sites have been selected. It is not clear from the consultation document what socio-economic data has been used to draw up the initial list of 10 potential sites and how if at all, site selection took account of economic impacts on coastal communities around Wales. We look forward to learning more about the socio-economic impact assessment to be undertaken for HPMCZs and contributing to this process.

Whilst noting that it is only possible to set out general management measures at this time we would like to take this opportunity to comment on the information provided in part 4 of the consultation document. We are pleased that WG have recognised that management measures are only likely to succeed if users are aware of them; this is particularly true for boaters in relation to any 'zoning' that may take place within the boundaries of HPMCZs. It is our view that zones of restricted activities such as anchoring must be clearly marked with buoys that are easily visible to mariners at all times of the day and night. We are concerned that such demarcation may however be considered, as indeed they are, a type of navigation aid and therefore be incompatible with the HPMCZ. Without clear delineation of restricted areas within HPMCZs it is our view that boaters could not reasonably be expected to observe such management measures. As recreational boaters often travel from one part of the UK to another it will be essential that whatever marking buoyage is chosen is consistent throughout UK waters. We would urge WG to address this issue in collaboration with Defra, Marine Scotland and the DOE in Northern Ireland to ensure consistency in this matter.

The enforcement of formal management measures (Nature Conservation Orders, Fisheries Orders and Risk Management Areas) has the potential to require significant resources; given that 'no one organisation has been identified as having overall responsibility for delivering effective management measures' we question whether such resources will be available following designation of the HPMCZs. Many of the measures in place to manage activity within existing marine protected areas in Welsh waters appear to be inadequately enforced due to a lack of resources. Given the current economic situation we would encourage the WG to consider whether it may be better to use the limited resources available to improve existing MPAs before designating new ones. Having responded to the recent consultation by WG on the creation of a Single Environmental Body (SEB) for Wales we are surprised by the lack of reference to this organisation in relation to enforcement. Given that the SEB is due to replace the Countryside Council for Wales (CCW) and Environment Agency Wales (EAW) should it be assumed that the relevant enforcement roles assigned to these organisations will be absorbed by the SEB?

The RYA and WYA are very supportive of voluntary agreements and codes of conduct. It is our view that such approaches give ownership of the issue in question to the users of a particular area leading to wider community engagement and observance of any restrictions. In addition voluntary approaches demand fewer resources and would be in our view more proportionate given the lack of data that exists about the relative impacts of certain activities. It would also be more in line with the management of existing marine protected areas, particularly in north Wales. The Pen Llŷn a'r Sarnau marine SAC for example has a long history of being managed successfully with local stakeholders including recreational boaters. The RYA and the WYA have considerable experience in facilitating voluntary behavioural change through its environmental programme The Green Blue. The on-going success of this programme illustrates the value of providing people with the information to understand and advice on how best to make sustainable choices. In our experience this approach leads to the long-term adoption of best practice and a growing appreciation of the value of the environment in which people go boating.

It is important to realise however that voluntary agreements and codes of conduct still require administrative support in order to coordinate the local community, produce resources and often manage a supporting website. The Pembrokeshire Coast National Park

Authority has a voluntary code of practice for recreational users which has been embraced by the recreational community. We are aware however that due to lack of funding there are likely to be issues with continued awareness raising and general communication about the code. It is essential that these elements of the voluntary approach are not ignored in any cost: benefit analysis.

We are pleased to note that WG recognises the need to establish a meaningful baseline against which monitoring of HPMCZs can take place. It is not clear from the consultation document however who will be responsible for carrying out the monitoring. As well as gathering ecological data, monitoring of HPMCZs should also gather data on the effectiveness of certain management measures. Furthermore, it will be essential to monitor whether the socio-economic costs restricting certain activities are balanced by the benefits to the relevant ecological features. Management measures should form part of the 6 yearly review programme for MCZs and we would expect that any measures found to be ineffective or disproportionate to be altered or lifted as appropriate.

Finally, it is clear from discussions with our clubs and members across Wales that there is strong criticism of the consultation process to date. The lack of consultation with local stakeholders has caused considerable disquiet as people have become concerned about the potentially significant socio-economic impacts on the activities of their clubs and training centres. The RYA and WYA would encourage WG to consider more thorough stakeholder engagement in the MCZ process going forward; lack of local support for any protected area is likely to compromise the successful management of the site.

Site Specific Comments

The RYA and WYA have strong concerns about the proposed HPMCZs on the north west coast of Wales. This area is particularly important for recreational boating and a number of the sites that have been proposed provide essential anchorages in inclement weather. Furthermore, recreational boating forms an integral part of the tourism market in north west Wales and the coast and marine economy in this region is predominantly, though not exclusively, tourism based. Any restrictions on activities that bring tourism to the area have the potential therefore to seriously affect the local economy. In addition, tourism is by nature a seasonal industry and the strong club network in north west Wales provides a valuable contribution to the local economy consistently throughout the year. Specific examples are provided below on a site by site basis.

<u>Puffin Island</u>

A small anchorage is located on the south side of Puffin Island which is used by recreational boats in inclement weather. The Royal Dee Yacht Club have class racing in this area making use of the existing navigation buoys. Small craft racing also takes place here and given the nature of these vessels, most of which do not have engines, in the event of a sudden change in wind conditions anchoring is required for crew safety.

The area is also used for the Menai Strait regatta which brings in around 100 boats over 14 days every August. This provides an invaluable boost to the local economy with an estimated

2500 ‘bed nights’ for accommodation providers in the area. Prohibiting vessel transit in this area would put this annual event in jeopardy.

A wealth of other club racing also takes place in this location, including the round Anglesey Offshore race, all of which would be compromised should vessel transit be banned in the proposed HPMCZs.

Should vessel transit and anchoring be prohibited within the boundaries of the proposed HPMCZ at Puffin Island the RYA and WYA would object. In our view it is not clear at this time that sufficient scientific evidence exists to support such restrictions in this location. In line with our position statement on such matters we will continue to object to these proposals until and unless clear scientific evidence is available and suitable alternative facilities are provided.

North East Menai Strait

This area includes the navigable channel for the Menai Straits which is used by recreational and commercial traffic exiting or entering the Straits via Puffin Sound. For continued safe navigation within this channel marker buoys are required on both sides as they demarcate the area within which a safe navigable depth exists at all states of the tide. The Ten Feet Bank and Dinmor Bank buoys, Trwyn Du lighthouse, Puffin Sound Perch, the Hoveringham Wreck Buoy, buoys B1,B2,B3,B4,B6 and B8 are all vital aids to safe navigation in the Puffin area and in the North East straits area. All of these will need maintenance and replacement over the years. Should navigation aids be banned in these locations the implications for navigational safety would be severe.

The area in to the north west of the proposed HPMCZ boundary is the only sheltered water from any northerly wind and is used as a safe haven in such weather conditions. Should anchoring be prohibited in this location the nearest alternative is Beaumaris; travelling the extra 5.5km could compromise the safety of mariners in difficult weather conditions.

The Menai Straits and waters around Anglesey are notoriously dangerous and as a result the lifeboat station at Beaumaris is one of the busiest in the UK. Prohibiting anchoring and banning navigation aids in the proposed HPMCZs at Puffin Island and the North East Menai Strait could increase the number of vessels requiring assistance from the RNLI within this already busy sea area.

Suggestions received from local members for possible alternatives include The Swellies in the Menai Strait, and Great Orme Head (which has similar habitats to Puffin Island without the deleterious implications for recreational boaters).

Should vessel transit and anchoring be prohibited within the boundaries of the proposed HPMCZ in North East Menai Strait the RYA and WYA would object. In our view it is not clear at this time that sufficient scientific evidence exists to support such restrictions in this location. In line with our position statement on such matters we will continue to object to these proposals until and unless clear scientific evidence is available and suitable alternative facilities are provided.

North Lleyn Peninsula

North Lleyn is used by coastal traffic heading from Caernarfon Bar and Porthdinllaen towards Ireland or Bardsey Sound. To the best of our knowledge it would be unusual for recreational craft to anchor or moor in this area rather taking advantage of the better conditions offered at Porthdinllaen which lies outside of the proposed boundary.

Should vessel transit and anchoring be prohibited within the boundaries of the proposed HPMCZ in North Lleyn Peninsula the RYA and WYA would object. In our view it is not clear at this time that sufficient scientific evidence exists to support such restrictions in this location. In line with our position statement on such matters we will continue to object to these proposals until and unless clear scientific evidence is available and suitable alternative facilities are provided.

Bardsey Island

Bardsey Sound is regularly used by traffic heading from Caernarfon or Holyhead towards Cardigan Bay. The proposed HPMCZ boundary includes the whole island, including the harbour and the anchorage.

Whilst not heavily used the harbour and anchorage on Bardsey Island are the only refuges for anchoring if mariners are caught by the very fast tides that surround the island. It is very difficult to avoid Bardsey Island when making passage to Anglesey or Ireland and if the weather and tide conditions are challenging the harbour/anchorage offer invaluable resting points. In addition, the harbour offers the only access to Bardsey Island for seafaring visitors.

Should the Bardsey Island be progressed as an HPMCZ the RYA and WYA require that the boundary is changed to exclude the harbour and anchorage. Should the proposals extend to prohibiting vessel transit in this area however both organisations would continue to object.

St Tudwal's Island East & Llanbedrog

The RYA and the WYA have strong objections to this site due to its importance for recreational boating in north Wales. The boundary of this proposed HPMCZ contains a number of sailing clubs including Pwllheli which hosts part of the UK national sailing academy network.

These are the only such facilities in Wales for the sport of sailing. In the last six years Pwllheli has hosted four World Championships and by the end of this season 26 UK championships will have been held as well. These events have attracted competitors from over 30 countries on four continents and have truly placed Pwllheli on the World stage.

The strategic importance of Pwllheli as an international sailing events venue has been confirmed with the investment by the WG, WEFO and Cyngor Gwynedd of £8.3m in the new Welsh National Sailing Academy and Events Centre facility that will be completed by winter

2013/14. Any proposals to restrict racing by yachts and dinghies, laying of marks and anchoring would undermine the activities and business of the National Academy and threaten its international reputation.

The proposed HPMCZ poses a significant threat to the activities and business of Pwllheli Sailing Club (a not-for profit enterprise) by virtue of the proposed management measures that could restrict navigation for all members and ban anchoring generally. There are adverse consequences for our cruising members with the proposals throughout Welsh waters. It is likely that the proposed HPMCZ would result in a decline in club membership and the displacement of recreational sailors to other locations. As a consequence there would be a loss of boats from Hafan Pwllheli and a deleterious impact on local commercial marine traders.

South Caernarvonshire Yacht Club is also located within the boundary of this proposed HPMCZ. An extremely successful club, SCYC operates a seasonal launch service to members who moor their yachts seasonally approximately 250 yards off the headland. These moorings have been in place for the lifetime of the club (around 100 years) and are regularly used by boaters who through participation with the club support the local economy.

The area off Llanbedrog is also an important anchorage in unsettled weather; this site along with East Tudwals provides important shelter from westerly gales.

Given the significant level of recreational boating activity in this area and the importance of this activity to the local economy the RYA and WYA object to the proposed HPMCZ at St Tudwal's Island East & Llanbedrog. Specifically we object to vessel transit and anchoring being prohibited as in our view it is not clear at this time that sufficient scientific evidence exists to support such restrictions in this location. In line with our position statement on such matters we will continue to object to these proposals until and unless clear scientific evidence is available and suitable alternative facilities are provided.

<u>Mouth of Dwyfor</u>

This is a popular boating area between Pwllheli and Porthmadog in Tremadog Bay. Part of this site is used as an anchorage whilst waiting for the tide to enter Porthmadog which can only be entered within two hours of high water. Should vessel transit and anchoring be prohibited within the boundaries of the proposed HPMCZ the RYA and WYA would object. In our view it is not clear at this time that sufficient scientific evidence exists to support such restrictions in this location. In line with our position statement on such matters we will continue to object to these proposals until and unless clear scientific evidence is available and suitable alternative facilities are provided.

<u>Newquay Offshore</u>

This HPMCZ lies in relatively deeper water and should have little impact on recreational boating activity. However, should vessel transit and anchoring be prohibited within the boundaries of the proposed HPMCZ the RYA and WYA would object. In our view it is not clear at this time that sufficient scientific evidence exists to support such restrictions in this location. In line with our position statement on such matters we will continue to object to

these proposals until and unless clear scientific evidence is available and suitable alternative facilities are provided.

South West of Strumble Head

Should vessel transit and anchoring be prohibited within the boundaries of the proposed HPMCZ the RYA and WYA would object. In our view it is not clear at this time that sufficient scientific evidence exists to support such restrictions in this location. In line with our position statement on such matters we will continue to object to these proposals until and unless clear scientific evidence is available and suitable alternative facilities are provided.

Skomer

The RYA and WYA recognise that Skomer is already a Marine Nature Reserve and that the proposed HPMCZ would replace this designation and extend the boundary to include Marloes Sands.

Skomer lies within an important sailing area particularly for those on passage to Ireland. Should vessels be banned from anchoring around Skomer it will be difficult for smaller vessels to reach Ireland within 12 hours and any detours caused by exclusion of vessel transit would result in either arriving in Ireland at night or departing before dawn. Both these options increase the risks to small boats and their crews and indeed other sea users they may come across whilst making passage.

Furthermore, being able to anchor in the South and North Haven is vital as the west of the islands (Wild Goose Race) can be dangerous to yachts and Jack Sound should only be attempted during the tidal gate unless the yachtsman is very familiar with the Sound. As such these two anchorages provide safe havens to vessels whilst waiting for the safe tidal gates. In addition, the North Haven provides the only way to access Skomer by sea and has been used for many years by visiting yachts.

CCW, who manage the existing MNR, have already installed a series of moorings in the North Haven to minimise impacts to the seagrass beds. Should anchoring be prohibited elsewhere around Skomer it would be advantageous to afford similar reasonable facilities to recreational boaters.

Should vessel transit and anchoring be prohibited within the boundaries of the proposed HPMCZ at Skomer the RYA and WYA would object. In line with our position statement on such matters we will continue to object to these proposals until and unless clear scientific evidence is available and suitable alternative facilities are provided.

Dale

The proposed HPMCZ boundary at Dale includes an important anchorage for recreational boaters. Sheltered from most prevailing winds and available at all states of the tide this anchorage is valuable for vessels seeking refuge from inclement weather.

The bay is also one of the few safe anchorages close to the mouth of Milford Haven and is frequently used as a refuge as the marinas in the Haven have tidal restrictions. It is essential therefore to have an anchorage that can be used whilst waiting for weather or tide conditions, particularly after a long passage. To continue into the Haven seeking refuge can be challenging as it requires negotiation of busy commercial shipping lanes; to attempt this whilst tired could be dangerous for all users of the Haven.

Furthermore the anchorage at Dale is accessible in virtually all weather conditions and at night so that small vessels, particularly those that may be new to the area, can proceed into the Haven at a more convenient time with increased safety and to avoid possible conflict with commercial vessels. The gently shelving nature of the bay means that large, deep draft boats can anchor further offshore than smaller, shallow draft boats; providing moorings as an alternative in this location may therefore be difficult.

Recreational boating contributes significantly to the economy in Dale village and the whole area around the Haven is hugely popular with boaters. The contribution to local business varies however one member estimated that they spend at least £15,000 per annum through keeping their boat in and around Dale. Introducing restrictions across the Bay near Dale could discourage boaters from visiting the area and indeed cruising further afield. Travelling up into Milford Haven to stopover would add a considerable amount of time to a passage to the west Wales coast and, when considered alongside the potential for bad weather and having to make this detour at night time, this is likely to discourage some boaters from visiting the region.

Should vessel transit and anchoring be prohibited within the boundaries of the proposed HPMCZ at Dale the RYA and WYA would object. In line with our position statement on such matters we will continue to object to these proposals until and unless clear scientific evidence is available and suitable alternative facilities are provided.

I hope the comments provided in this letter are useful and look forward to receiving your response. We commend the WG to the specific and detailed responses submitted by a number of RYA clubs and training centres around Wales and confirm that the RYA and WYA are supportive of these submissions. If you wish to discuss any of the issues raised in this letter then please do not hesitate to contact me.

Yours sincerely,

Caroline Price
RYA Planning and Environmental Advisor

Enc: RYA Position Statement on Marine Protected Areas
Cc: Director of Navigation, Trinity House