

SUMMARY OF CONSULTATION RESPONSES (LONG VERSION)

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SECTION 1: BACKGROUND

OVERALL AIMS & BACKGROUND

1. Complexities and variation potential of what a natural capital approach is are not discussed.
2. Definition of natural capital in Box 1 oversimplifies the approach.
3. A natural capital plan will identify where money can be spent on natural features in order to deliver benefits to society. It should be noted this approach will not necessarily deliver nature recovery in its fullest sense.
4. Place-based decision making (stated purpose of the plan) needs defining / explanation.
5. Summary statements throughout section 1.1. and 1.2 appear disconnected.
6. Order of this section could be rearranged - statement of intent for the plan, context and concepts introduced first before aims would help.
7. Audience should be a sub-section in its own right – greater specificity required or examples of ‘decisions that affect the marine environment’.
8. Need to define the audience - who is this for? The first paragraph is clearly aimed at a very technical audience and would be impenetrable for a lay or even less experienced audience. Make this clear right at the top, and perhaps signpost to a simpler version aimed at a wider audience.
9. This is a very wide group of audiences with very different skillsets and knowledge bases. It would be sensible to break this down into groups e.g. statutory regulators, planning, and NGOs, private businesses and investment, voluntary groups and community - then identify which parts of this plan they will find most useful or point them to other key documents etc.
10. Include context of Marine Pioneer in background information
11. The first section needs to reference how this will fit within the context of the Nature Recovery Network (another 25 YEP policy). The NRN should underlie this and other plans as the biodiversity basemap, ensuring that even where elements of biodiversity aren't providing clear services (or may even appear to be detrimental in terms of services) they are identified for recovery and potentially protection.
12. The vision is clear about the links between land based activities and the quality of the marine environment but this should be emphasised more in section 1 (eg. 1.2 10 could include references to agricultural runoff and other land- based litter and pollution)

THE PLAN AREA

13. Simplify description of plan area – include coordinates and common reference points, remove / reduce descriptive paragraphs e.g. para 14.
14. Acknowledge a border with the Welsh but aspirations or caveats should be included later or as footnotes to aid reading.
15. Unnecessary description of history of MCZ designations in the area – simplify / summarise
16. Give ‘evidence’ such as Asset & Risk Register its own section and define technical terms
17. Para 15 – Exmoor National Park, how many SSSIs? SACs? Worth discussing the terrestrial (coastal) SSSIs and SACs as well as marine - this extends 1km inland
18. Para 16 - No there are 3 types of MPA - don't forget SSSI – e.g. Taw-Torrige Estuary
19. Para 17 - Need to add SW Approaches to Bristol Channel MCZ
20. Para 18 - I would put these different byelaw restrictions into a separate table that could be updated easily. As these byelaws are reviewed every 3 years, this text will rapidly become out of date

21. Para 19 - It is important to recognise that SSSIs form part of our 'coherent network of MPAs' and shouldn't be separated out like this. They often cover important estuarine and coastal habitats, which also support important seabird colonies among other species.
22. A key SSSI feature of North Devon and the estuary are wintering birds. Suggest this is mentioned in paragraph 19 as it illustrates the importance of the intertidal habitat here and its interaction with migratory species.
23. Diagram on page 8 - This diagram is regularly used but it clearly misses out biodiversity as a service or benefit, which is fundamentally incorrect. By just viewing biodiversity as the service provider, it does not place value on biodiversity in its own right, but merely as the tool to providing other benefits. Biodiversity clearly provides benefits that we can't even know are present yet - it has done throughout history. This approach is very reductionist and risks not protecting and valuing the entire biological system. By simply adding biodiversity into all four sections, this could be rectified.
24. Para 22 – further services e.g. BIODIVERSITY, air quality, water quality, health and wellbeing, social interactions
25. Para 23 – assets: Break these into bullets - it is hard to pick out in this form.
26. Para 23 - Risk? Is this a risk to the asset, a risk to the service, a risk to a process, to the whole feature or part of it? Is it short term, medium term, long term? Risk needs defining here.
27. Para 24 – this appear to be jumping straight to results of another study. This is confusing layout. Technically this is still in the section titled Plan Area. Should this be an Executive Summary?
28. Paragraph 15 – unusual to refer to the core of the North Devon Biosphere reserve as Braunton Burrows dune system – is this written in the Biosphere Policy/strategy documents – if so can this be referenced
29. In paragraph 17 MCZ designation are listed but no EMS – these should include Lundy SAC and Braunton Burrows SAC
30. Paragraph 18: a map would be useful here to show the relevant fishing areas that are referred to (the Ray Box, Whelk Box, etc.). When talking about Lundy NTZ it should read D&S IFCA byelaws – not IFCA. The netting and towed gear zonal restrictions were in place long before the MCZ designation at Lundy. The restrictions for mobile fishing vessels have been extended further in 2014 in parts of the Lundy SAC. D&S IFCA's Netting, Potting, Diving and Mobile Fishing Permit Byelaws all prohibit the removal of spiny lobsters from within the Lundy MCZ as well as Bideford to Foreland Point MCZ
31. Paragraph 19 minor point: the species name for grey seal (*Halichoerus grypus*) has been misspelled.
32. Paragraph 19: Should the SSSIs be listed?
33. Paragraph 40 or thereabouts would benefit from reference to the 25 Year Environment Plan
34. Page 11- under statutory plans - could the D&S IFCA Annual plans be referenced here? One is produced each year in April and refers to management of fishing activities, compliance monitoring and evidence gathering as well as internal process – on our website <https://www.devonandsevernifca.gov.uk/Resource-library/A-Role-function-and-management-of-the-Authority>

STRATEGIC AND LEGAL CONTEXT

35. Suggestion that this information would be better included in the governance section
36. Further clarification on the relevance of each policy needed
37. Include as an annex?

38. Para 26 - Would be worth mentioning SW Marine Plan, Fisheries Bill and IFCA byelaws.
39. Para 30 – garbage is American slang - rubbish or waste
40. Para 32 – add more info please, consistent with previous paras
41. Paras 32-33 - Use same formatting as previous paras to highlight convention names
42. Para 35 - This doesn't properly explain an SEA, which is a higher level strategic look at impacts often of multiple developments or activities and often on multiple sites or protected features - hence it is often required in conjunction with an appropriate assessment/HRA.
43. Para 38 – 'loss of biodiversity': Worth flagging that the Environment Bill would override this to become a requirement for net gain in biodiversity.
44. Para 40 – the Env Bill policy does not allude to 'no net loss of biodiversity' Current legislation/policy is no net loss, the Environment Bill is moving to net gain - moving current NPPF policy to legislation across sectors. Also, worth flagging Local Nature Recovery Strategies as part of this with legal obligation for mapping and delivery.
45. Under description of the Environment Bill (paragraph 40) would there be value in referencing the statutory requirement for net gain through planning, which could be particularly relevant to the estuary and its intertidal habitats, which are at risk of significant degradation (disturbance, etc.) as a result of development.
46. Reference to Lundy Marine Management Plan 2017 is missing?

OVERVIEW OF PLAN DEVELOPMENT AND SUPPORTING DOCUMENTS

47. Descriptive only – further clarification on the role of listed documents in supporting the Plan is required
48. Perhaps include as a schematic
49. Figure 3 - The right hand side of this demonstrates the lack of sustainability of this process - it must have environment or biodiversity on the right side to balance against socio-economics. Adaptability to future unknowns comes from biodiversity
50. Paras 56-58 - inset these three paras to make clearer
51. Para 64 – wording needs to be changed. biodiversity is not an aesthetic pleasure, it is an underlying principle of evolution and natural selection and essential to life. This is a belittling comment.

SECTION 2: VISION, AIMS, OBJECTIVES AND POLICIES

SCENARIOS FOR THE FUTURE

52. Requires an introduction that includes definition of 'scenarios' and explanation of the purpose of the scenario-testing workshop in development of the vision
53. Include flow diagram to describe the process
54. Further clarification on how each scenario relates to the Plan required
55. Remove unnecessary description of other MERP work not specifically related to the Plan
56. Definition of terms required for 'themes' and 'guiding principles'

VISION FOR THE PLAN AREA

57. Suggest swap section 2.1 and 2.2 so vision comes first and scenarios describe development and rationalisation
58. first line: habitats are a part of wildlife. Do you mean thriving species within protected habitats? Or thriving wildlife within protected seas?
59. 'Prosperous fishing industry': Change to sustainable fishing industry. Anything can be prosperous for a short period, but sustainability is key here.
60. 'Clean growth': Is this really possible? This sounds like a politician's term, and I doubt this is feasible - what is 'clean'?

61. 'Nature will be considered as a whole system': Only if nature/biodiversity is recognised as a benefit and service in its own right
62. Vision for the plan – *"There will be clean growth in the tourism sector and land-based activities will consider impacts on the sea and mitigate those issues."* Can this be re-worded to something more ambitious like *'There will be clean growth in the tourism sector and land-based activities will consider impacts on the sea, changing how these activities are delivered to avoid or mitigate negative impacts.'*
63. Overall, the vision is useful and relatively clear. However, D&S IFCA suggests that more emphasis should be placed on the sustainability of maritime industries (including fisheries and mariculture). In addition, more emphasis is required on the consideration of nature as a whole system, perhaps tying in a brief definition of the ecosystem approach; currently the vision states the "Nature will be considered as a whole system, recognising that land and sea are intrinsically linked...", but it is important to recognise not only that there are linkages between land and sea but also between all elements of what happens within each of these realms, and the additive/synergistic effects of multiple activities on nature (on a range of Nature receptors, rather than simply considering those receptors that a given activity obviously impacts).
64. Paragraph 57 – In the context of the North Devon area, and the UK as a whole, would this benefit from explicit mention of food security (including fisheries and mariculture) as part of National Security

AIMS AND OBJECTIVES

65. Definition of 'strategic aims' and 'asset specific objectives'
66. Add rationale for each of the aims – further clarification on how they are 'natural capital specific'
67. Reference the monitoring and evaluation section here to ensure clarity on how aims and objectives will be monitored
68. Further clarification on how aims and objectives fit with overall aims and vision
69. Explicit links need to be made between policies and aims and objectives
70. The context and overall aim are quite clear. However, some aims and objectives have specific actions that seem targeted to individuals/ organisations, and it is not clear who is the intended actor for these actions, or on what basis they are/are not obliged to fulfil these actions. This could be clarified in this section of the Plan

AM01

71. Obj1.2 FRMP and the herring project are introduced but no background or information on them given.
72. 1.1 - Based on where opportunities are identified at a whole ecosystem level - i.e. not just a sustainable fishery but also a sustainable system supporting that fishery
73. 1.3 – 'sustainable exploitation limits' - I think standard terminology such as Maximum Sustainable Yield should be used here for the avoidance of doubt and misinterpretation. And levels should be well below limits.
74. 1.8 – fishery sustainability – add 'and ecosystem sustainability'
75. Title – 'fisheries' – add 'and ecosystems'; don't just look at fish stocks but whole ecosystems
76. AM01: Should include European eels? Other species?
77. Objectives 1.1 and 1.7 require buy-in at a high level (i.e. from Defra and MMO), not just from IFCA's, fishers etc. For points like this, the associated uncertainty in

feasibility, and/or the difficulties associated with achieving the objective should be acknowledged, and in all cases it would be useful to identify the relevant actors and the obligations they would/ would not be under to work towards the objectives. Overall, the processes are relatively unclear. National development of working groups to look at species/ species groups is up and running and may lead this rather than directly through the ND MNCP.

78. Objective 1.3 has an underlying indicator of “Annual landings (tonnes and £) per species by vessels operating from NDMP ports”. However, this is likely to be difficult to quantify accurately and reliably – landings by North Devon fishers are often not recorded as they are under the recordable limit and are sold directly to the public. This is also likely to be problematic for indicator 1.7(i).
79. Objectives 1.4 and 1.5 are clearly workstreams that are delivered by the IFCA; however, IFCA workstreams are decided based on authority input and IFCA obligations under the Marine and Coastal Access Act and should not be seen to be dictated elsewhere. It is therefore unclear how these objectives should be framed in terms of the relevant actors and the obligations they would/ would not be under to work towards the objectives.
80. Objective 1.6 is a useful example of how some aspects of the Plan could be clarified in the context of the broader management of the marine environment, the pressures that it faces, and the complex regulatory environment. While actions to maintain migratory fish stocks may be possible within the Plan area, it is clear that this objective may still not be met due to e.g. high fishing pressure, environmental factors, other human activity, or other reasons contributing to high mortality, poor reproduction/growth etc that are not in the control of actors within the Plan area. It would be useful to clarify this context and how management/ monitoring/objectives can account for this. The same is true of Objective 1.7, and several others throughout the Plan.

AM02

81. 2.1 - high-bar environmental CoC
82. 2.2 – Replace sustainable exploitation limits with well below Max Sustainable Yield
83. Objective 2.1: Some codes of conduct for this already exist in various forms; clarity on specific requirements and objectives of this code of conduct would be useful. As with policies above, the relevant actors and their obligations are unclear. D&S IFCA are currently developing a Mariculture Strategy which will aim to help new and existing members in this industry, Hand Working Permit Byelaw will have measures in it such as back filling holes dug for bait and limit of recreational intertidal hand gathering catch of shellfish.
84. Objective 2.2 should include a statement that this should occur within the bounds of sustainability and the requirements of other legitimate users of the marine environment. Sustainable exploitation limits of commercial shellfish gathering are determined by conservation objectives of MPA e.g. Tav Torridge SSSI and overwintering bird food availability so some reference to these should be included.
85. Objective 2.3 is another good example of an objective for which a specific actor is clearly intended, but it is not clear who/ which organisation this is. It would be useful if the wording could be altered to reflect either (i) who is being referred to, or (ii) that a feasibility study is desirable, but that this is not a targeted action

AM03

86. Obj3.1, 3.2 and 3.6 Links with other aims are made here, but nowhere else. Yet 3.4 doesn't link to 3.1 or 3.2
87. 3.1 – voluntary – with plan for legislating if this is not successful
88. 3.2 – Sensitive habitats should be protected – this reads as encouraging damaging activity. Replace with 'replace damaging moorings with eco-moorings' where evidence suggests this can be supported. Create no mooring zones to protect highly sensitive areas and work with stakeholders to raise awareness, understanding and self-policing
89. AM03: "Implement the recommendations from the seabird disturbance report to reduce and where possible eliminate overwintering bird disturbance by recreational use". Suggest re-wording so more ambitious.
90. Key issue for all these objectives are how would they be implemented and how would they be funded. Also issue of ensuring that they are policed and enforced. Risk that they would be viewed as being too bureaucratic and a means of generating income from recreational users. Not sure if the powers exist to enforce these proposals. The plan makes no mention of the need to restrict or limit access for recreational use. What is the limit? Are there too many boats making diving trips off Lundy; what is the capacity of the estuary for jet ski's, dinghies etc. Regarding eco-moorings there is no explanation of what these are that I could find.
91. AM 03 sustainable tourism - nothing on education of water users, tourism facility providers or the tourists (all 5.6 million of them). Needs to be a resourced activity and therefore included as an objective. (For example PFND visitor campaign)
<https://www.plasticfreenorthdevon.org/plastic-free-holidays>

AM04

92. 4.3 - reinstate Instow Bathing Water and use as public target for water quality improvement.
93. Objective 4.2 is important for the marine environment generally (including for aquaculture/shellfish harvesting as identified), and will likely require intense multi-agency and cross-jurisdiction working to achieve
94. AM 04 4.6 - not sure that listing PFND as a specific charity here (in the strategic aims and objectives section) is right. At this level, there should be an aim/objective to reduce/prevent pollution entering the marine environment from land based sources (plastic, chemicals, slurry, etc). Link to PFND and other local delivery mechanisms comes further down.
95. General comment - Land based activities affect the coastline - we 'pfnd' also link in more with regards to encouraging reduction in consumerism, promotion of ecotourism, awareness raising, encouraging behaviour change in inland communities as well as coastal communities. - Is there a chance to highlight that connection more?

AM05

96. Title and section - This should go beyond protection of biodiversity to nature recovery. As such there should be a policy here addressing the link to the Nature Recovery Network and Local Nature Recovery Strategies.
97. 5.1 - HPMA's are not just for degraded habitats. A range of locations covering a variety of habitats, pressures and scales should be researched and investigated and where appropriate put forward for consideration to become HPMA's

98. 5.2 – integrate Natural Capital approach to mgt of MPAs - Where appropriate, but always seeking to put biodiversity as key benefit/service/outcome
99. 5.2 – deliver Biodiversity Net Gain and where possible wider environmental net gain
100. 5.3 – fisheries co-management - What does this mean?
101. AM05 feels like it should go much further. Would benefit being informed by data relating to the condition of North Devon’s marine habitats (at least within the Marine Protected Area). The Plan needs to be much more specific if it is to achieve tangible and positive change.
102. AM05: 5.1. Add the following words (or similar) to strengthen this ambition “*Support research and monitoring to identify degraded habitats with potential for recovery under Highly Protected Marine Area management measures, and deliver measures for recovery.*”
103. AM05: 5.4. I’m not sure how this specifically relates to protection of marine and intertidal biodiversity? Would benefit being more specific – picking out the key natural capital assets that will particularly deliver biodiversity benefit in North Devon. Sand dunes aren’t mentioned at all in this section?
104. Should there not be mention of plastics in this section? linked to impact on wildlife in marine environments. Or are we assuming that the impact of plastics are entwined into 'enhancing clean water + reducing impact on wildlife'.
105. 5.1 The reference to highly protected marine area management measures is unclear. There are no HPMA in the NDMP/Biosphere area and measures have yet to be decided once HPMA are introduced. What areas are being referred to here? This would not apply to the whole of the NDMP area.
106. 5.2 Regulatory bodies such as D&S IFCA are required to balance the needs of all users as well as the marine environment. Any management would be decided through the D&S IFCA and appropriate consultation. 5.5 It is not clear what is being referred to as a trial – D&S IFCA has already introduced IVMS to all mobile gear fishing vessels so have the ability to monitor fishing activity already across different habitats.

AM06

107. 6.1 Example of where a specific metric has been given (50-80Ha by 2030) but no rationale or context provided. Where do these numbers come from? Specific detail doesn’t need to be included in the plan but not knowing background of such figures makes the reader question the validity of the objective.
108. Obj6.5 and Obj6.6 read as points on an action plan instead of objectives
109. 6.5 – ‘acceptable’ - Change to 'minimum criteria to enable project consideration'. Acceptable sounds like if you do this you will be accepted.
110. AM06: 6.1. How has this value been calculated? Please also add the words “*and compensate for any freshwater and/or terrestrial priority habitat losses to ensure overall biodiversity net gain.*” (There is an action for this in the Action Plan, but it’s missing here).
111. AM06: 6.2 & 6.3. These need to be more specific to be truly achievable. Why are they unfavourable? What is the cause? Does this action link with other aims? Is it more likely that habitats in the estuary will evolve with climate change? For example, saltmarsh being displaced by mudflat, etc? We need to allow for natural evolution/adaptation of habitats, while making space for displaced habitats. There is a risk that we are trying to preserve habitats where they are no longer appropriate, and this plan is an opportunity to reflect this (and indeed it does reference this in the Action Plan).

112. AM06: 6.6. “Reduce social and economic risk from natural hazards through investment in solutions that achieve protection by emulating or re-establishing natural processes.” The use of the term ‘natural sea defences’ still infer some kind of engineered design, which may be the case, but we should be seeking to work with natural processes as standard.
113. 6.5 It is not clear what this means – perhaps a little more detail will help.

AM07

114. Section - Key to mention DBRC and DASH here, both of which already have local records for biodiversity etc. Also important to include Nature Recovery Network here with its monitoring and evaluation
115. 7.1 – catch and effort - and wider ecosystem assessment of impacts of fishery
116. 7.9 - for a range of purposes, e.g. coastal storm impacts
117. AM07. The aims don’t appear to address the title of ‘DEVELOP A CENTRALISED DATABASE AND KNOWLEDGE SHARING’, but rather provide a summary of further data collation? How will the plan achieve a more co-ordinated approach to data/knowledge sharing? For example, how will GeoNode be used going forward?
118. 7.1 Who will host this information and who will have access to it – D&S IFCA?

POLICIES

119. The relevance of some policies could be made explicit in the table of objectives.
120. Are the policies SMART?
121. Who are the policies intended for?
122. There are 51 objective and only 11 policies. The question of delivery for all objectives should be considered across all policies.
123. PL09. Could this also include wording that recognises the need to allow space for habitats to evolve and adapt to climate change, so that habitats aren’t preserved in an unsustainable and isolated state?
124. I haven’t cross-checked, but is there at least one policy for each objective?
125. PL01 Use more postgraduate students to research at minimal cost and with benefits to themselves
126. PL04 Terrestrial action needed
127. PL07 More enforcement of regulations about use of the habitats for any purpose
128. D&S IFCA agree with this aim. However, we would like to draw attention to an apparent discrepancy which, if addressed, would likely improve future progress towards achieving this aim. Plan Policy PL03 states that “Development or activities within existing or potential strategic areas of sustainable mariculture production must demonstrate consideration of and compatibility with sustainable mariculture production.” However, there is no similar consideration for existing fisheries activities. Requiring future development or activities within areas of existing (or potential) sustainable wild-capture fisheries activity to demonstrate consideration of, and compatibility with, sustainable wild-capture fisheries may afford these fisheries the protection they require to operate sustainably. There does need to be a separate policy on this – to consider the existing users and uses of the sea area (a duty that MMO are obliged to do under MaCCA) when encouraging developments such as mariculture. This has been absent in national marine plans.
129. PL03 This is a useful addition to the Plan, but D&S IFCA are concerned that there is no similar consideration for existing wild-capture fisheries activities. D&S IFCA’s District is home to small-scale wild-capture fisheries of great social and heritage

value. Requiring future development or activities within areas of existing (or potential) sustainable wild-capture fisheries activity to demonstrate consideration of, and compatibility with, sustainable wild-capture fisheries may afford these fisheries the protection they require to operate sustainably. There does need to be a separate policy on this – to consider the existing users and uses of the sea area (a duty that MMO are obliged to do under MaCCA) when encouraging developments such as mariculture. This has been absent in national marine plans.

130. PL06 This seems to refer to PL07 in the Plan, but is not an exact copy of PL07s policy statement.
131. PL07 This statement is PL08 in the Plan. Should this refer directly to the Natural England site conservation objectives?
132. PL08 This Policy is PL09 in the Plan. It's not yet clear to me how this sits alongside current legislation which grants protection specifically to qualified features, e.g. what weight would the plan have in ensuring that the whole site is considered, rather than just the identified features. It is also unclear how this would be achieved on a practical level - given that it is difficult enough to monitor specifically designated and delineated features, how can the monitoring individual/organisation monitor the whole site, or even begin to define targets for the whole site? As mentioned previously, D&S IFCA can introduce management to protect site features. Further whole site protection if proposed would have to go through the IFCA decision making process and consider its other duties to balance the needs of all users whilst ensure marine protection and viable fishing industry. Management of HPMA might be different if it was a Government revised approach
133. PL09 This is PL10 in the Plan. As previously mentioned D&S IFCA introduces appropriate management on a range of habitats depending on the impact of the interaction with the fishing gear in MPAs. Assessment are undertaken and measures introduced after formal advice from NE. Further restrictions outside of MPAs may impact the limited demersal fisheries in North Devon, - this may be contrary to the plan suggesting it will support local fisheries. Is the plan suggesting that demersal fisheries are removed from the ND marine pioneer area
134. PL10 This statement is PL05 in the Plan
135. PL11 This statement is PL06 in the Plan
136. PL12 This is policy PL11 in the Plan, but refers to PL12 in the Policy Description column of the relevant table. The Plan only has 11 Policy statements (PL01-PL11). Rather than aiming for “no net loss of biodiversity or natural capital”, a plan such as this should aim for net gain

SECTION 3: GOVERNANCE

GENERAL COMMENTS

137. Intent to integrate marine governance is stated but need clarification on who delivery bodies are / responsibilities of different agencies and more detail on how this will be achieved.
138. Much of Section 3 (governance) should be in the background section.
139. Understanding what the Marine Pioneer is and all of the different actors and bodies mentioned must be better defined - it is not clear who has responsibility, what is driving the plan and who has contributed.

140. The range of interests in the marine environment are so numerous and varied in terms of their scope and power (statutory bodies to local volunteer groups) that without a local champion who can help steer these various groups and co-ordinate responses the marine pioneer will have no useful local legacy - I emphasise local requirement. Building the relationships with all these organisations is a full time job let alone going on to manage them in a meaningful way to collate opinions and bring about useful and locally relevant decisions As specific examples - Bideford Town Council has a decarbonisation committee which amongst other things is looking at the feasibility of tidal electric production in the estuary - the marine pioneer should surely be involved - The development of the wharves at East the Water represents £20m investment but has TDC planning or the developer involved the marine pioneer or vice versa?. Yet this is the biggest brownfield town centre development on the estuary, maybe in all Devon. It would seem to be an opportunity to test some of the ways of working being proposed and even to try to influence the development, currently at pre-planning stage to ensure minimal impact on the estuarine environment.
141. But need greater clarity on the role of the TTEF and the links with all the other stakeholders in the marine environment, I find it very confusing. Does Coastwise have a role?

BACKGROUND

142. This information should be integrated with Section 1
143. Further clarification required as to what other approaches have influenced the plan and how they relate to the natural capital approach
144. Further clarification is required for claims regarding marine planning in Para 90 and references needed
145. Citations are needed to support statements in Para 91 regarding stakeholder input and engagement.

THE MARINE PIONEER IN NORTH DEVON

146. Relevance of Marine Pioneer to governance section is not clear
147. Move Para 93 to evidence section
148. Overall Section 3.2 reads as 'notes, not a draft document'
149. Under 3.2 paragraph 93 some additional info about the FRMP would be useful. We would recommend the following: Fisheries Research and Management Plans (FRMPs) aim to bridge the gap between current, species-focused fisheries management and a more ecosystem-based approach at an appropriate scale. The FRMPs will provide an ecosystem-based review of the ecology, fisheries and management for key fish species within the North Devon Marine Pioneer area. This approach will integrate local and historical knowledge with scientific research outcomes, building the knowledge base for sustainable ecosystem-based management at an appropriate spatial scale, and highlighting current knowledge gaps to inform future research

PRINCIPLES FOR GOOD GOVERNANCE

150. Further clarification required for how Landscape Pioneer Strategy is relevant to the North Devon Marine Plan
151. Additional information needed to relate the four principles of governance to marine

REVIEW OF CURRENT GOVERNANCE

- 152. More information needed on current governance structures (including gaps)
- 153. Reference to work that is not published
- 154. Figure 4. Doesn't illustrate current governance, so appears strange to be the first thing under 'current governance'.
- 155. Definition needed for 'The local natural capital plan level'
- 156. An aspiration is stated for the biosphere but no route to delivery.
- 157. Definition needed for 'Adaptive governance'
- 158. Para 107 is important and should be very early in the document and be explicitly referred to for the intended audience.
- 159. Further clarification needed on the status of the NDMNCP as a supplementary planning document, or similar

THE BIOSPHERE PARTNERSHIP AND TEAM

- 160. This section talks about the current problems with governance in the area, could this be moved to the section 3.1?

PROPOSED GOVERNANCE STRUCTURE

- 161. Cross reference with AM08 and associated objectives
- 162. Further clarification needed for why a new governance structure is necessary
- 163. Some background information needed to introduce the various groups mentioned in this section
- 164. Include terms of reference for the proposed governance structure as an annex

CONFORMITY AND HARMONISATION

- 165. This section admits there are policy conflicts but gives no further information and does not clarify the decision-making process for resolution

SECTION 4: MONITORING AND EVALUATION

- 166. Clear logic chain between policies, objectives, aims and the indicators is missing so difficult to assess if the monitoring and evaluation is suitable
- 167. No indicators provided for the policies but para 130 states they will be monitored

SECTION: SUSTAINABLE FINANCE AND INVESTMENT

GENERAL COMMENTS

- 168. Once again the emphasis is on local but small local projects alone will not be viable to attract finance at scale. However a mechanism to consolidate many small projects would: - provide scale which is attractive - reduce risk because small projects are intrinsically risky but if 1 out of 10 fails that's not such a problem It is important to talk the right language to each group e.g. - finance to financiers./investors - science and ecology to scientists/amateur naturalists - appropriate level to public There has not been sufficient public engagement by the project, for understandable reasons mainly of resource, but there are undoubtedly many members of public who would like to know more and would welcome the opportunity to invest in their local environment via a blue bond or similar. However this won't happen without more general engagement. What about taking on some volunteer speakers who could be trained, given powerpoint presentation, supported with handouts and mirage allowance and go out to talk to local groups e.g. Rotary, WI, lunch groups etc are

always looking for speakers. Schools are interested but maybe more difficult to access due to time and curriculum demands

169. Funding / sustainability. Could we pitch the idea of an environmental levy on all visitors? We get millions of them a year because of the quality of the natural environment here, so why not get them to help fund its upkeep and improvement? Scottish government utilise a tourist tax - is this a model we could look into?

SECTION: ACTION PLAN

170. There appears to be no reference to the action plan throughout the main plan document.
171. 1/ Fisheries: As I understand it the numbers of local fishermen around the Torridge and Clovelly are reducing rapidly and consequently skills and local knowledge are being lost - maybe with the exception of crab and shellfish for which there is currently a good export market. Post Brexit will be interesting to watch how this evolves. Nevertheless there is an urgency to maintain especially the local artisanal fisheries (e.g. Clovelly herring) for which an unintended consequence of regulation is often making it just too difficult to continue fishing or encouraging more dangerous practice in order to stay on the right side of regulation
172. 2/ Sustainable use of the estuary by locals and visitors completely ignores the opportunities of marine heritage tourism. Way of the Wharves vision 'using heritage to create a better tomorrow' aligned with the North Devon Biosphere Marine Pioneer and the DEFRA 25 year environment plan objective 'to leave the environment in a better state for the next generation' and with the local council objectives to achieve carbon neutrality. The objects of the CIO are to create a range of learning programmes and activities for research, promotion and communication about the marine heritage within the North Devon Biosphere Marine Pioneer to local community, schools and visitors. This will be achieved by activities of the CIO and also partnering with other marine heritage organisations to develop in volunteers, local community and visitors an increased awareness of this marine heritage and a sense of pride to encourage and develop care and support for the marine environment. The CIO will work with the local council, developers, marine pioneer and other stakeholders to campaign for and help develop carbon neutral legacy projects on the estuary that will reflect both the maritime heritage and its position at the centre of the biosphere project for the benefit of the local community and visitors. We have already had discussions with the developer of the wharves site at East the Water to discuss the creation of a permanent base for the project on the wharves, being at the centre of a heritage conservation area, the estuary and the marine pioneer. We see this as a legacy of the development but would like to work with the biosphere marine pioneer and make this an even more valuable legacy project.
173. 3/ Citizen science needs to be encouraged to engage local interest and also to achieve some of the monitoring which will not otherwise be possible Ideas - drone flights and images of salt marsh and intertidal with regular monthly views of same transect to provide time sequence data - use local 'computer power' to analyse sort data as per some of the star astronomy programmes - I already tried a 'what's in the mud' survey but the pilot was not a success as the mud was just too hard to sieve and process but species identification and counting is not difficult. However without

baseline data it will be difficult to assess impacts on intertidal environments whether of climate change, developments e.g. the wharves East the Water, boating, shore access, bait digging or any other disturbance

174. More specific examples and projects would be useful.
175. The action plan contains the text “Long term (+5 years) dependant on feasibility study: increase in sustainable aquaculture in estuary”. This should also include sheltered areas of coastline. It is also not clear to which feasibility study this refers. Who is running this?

SECTION 5: SUSTAINABILITY ASSESSMENT

176. Paragraph 80 contains the text “Management of bait digging is likely to reduce disturbance of intertidal mud.”. However, the management of hand working (including bait digging) is still in its infancy and there may not be changes in management unless assessments identify this as a requirement - such as back filling holes and removing bait digging from sensitive habitats such as seagrass and Sabellaria. Perhaps this should read something more along the lines of: Future management of bait digging may be introduced in some areas which might have ecosystem benefits.
177. Paragraph 82 of the Plan states that there may be a decline in benefits from bait digging, as “future management of effort may restrict opportunities for individuals and prohibit expansion”; this is also reflected in Table 2 (Summary Table for the Sustainability Appraisal), which highlights that the expected changes in ecosystem goods/services from bait are negative in the longer term. This is also suggested in several areas of the full Sustainability Appraisal document. On the contrary, management of bait digging through DS IFCA’s proposed Hand Working Byelaw would seek to ensure longer-term sustainable provision of ecosystem services while simultaneously protecting features (e.g. seagrass) through certain spatial provisions (e.g. closed areas), providing sufficient quantities of sea fisheries resources for personal consumption (hence no planned or foreseen restriction of opportunities for non-commercial individuals), and allow permitting for (and monitoring of) commercial activity

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178. This looks to be a really interesting and useful tool - data has value and managed organised data has more value, I welcome the availability of free to use data but is this also a potential income source charging commercial organisations ? Maintaining the data and adding more data such as data from surveys for planning or other activities would increase the value of this tool for researchers and as a chargeable resource - can it be used for non ecological data such as marine heritage sites ? - I am very interested in visualising visitor numbers to heritage sites. This is something that is not done currently and affects adversely the ability to explain the value of heritage for locals and visitors. One of Way of the Wharves objectives is to Create a data collection system to quantify involvement of community and visitors in marine heritage within North Devon Marine Pioneer area for the benefit of local associations, local government, etc and to help inform future strategy and policy. This supports the

conclusions of the report Social and Economic Benefits of Marine and Maritime Cultural Heritage (Honor Frost Foundation 2015) “There is no reason why decision making with respect to marine and maritime cultural heritage should not have a firm evidence base” -

GENERAL COMMENTS

179. Specific comments on grammar / spelling errors
180. Referencing could be improved throughout the document
181. Consistency of terminology is currently lacking
182. Include glossary and / or list of acronyms
183. Order of some sections could be improved and connections / linkages between sections made clearer
184. Headings and subheadings could be improved (not consistent and references to sections sometimes incorrectly numbered)
185. Improved navigation references throughout would be highly appreciated. Perhaps a 'how to use this document section?
186. The audience for this document has not been made clear.
187. Separate guidance document for who and how to use the plan
188. The document contains a mixture of discussion, opinion, review and aspiration. Because of this it doesn't read like a plan.
189. The plan has involved extensive data collation, research and consultation. The Sustainability Appraisal and the Action Plan capture this detail. However, the Aims and Objectives, and the Policies seem to miss the opportunity to capture meaningful deliverables that are truly ambitious. For example, it would be great if key phrases such as 'adaptive management' could be captured more clearly in the aims and objectives of the plan, and in the policies as they are so important in delivering natural capital outcomes that benefit biodiversity.
190. Section 7.5 refers to detailed information about the North Devon Marine Natural Capital Plan area that hasn't been discussed or referenced before in the document. This information could play a much more prominent role in informing the aims, objectives and policies, and would make them feel more tangible.
191. Very hard to read document, would have liked a clear executive summary. Very much a motherhood and apple pie type of document, did leave me a 'so what' feeling.
192. It is very worthy but unwieldy so unlikely to be read or used constructively
193. Add list of stakeholders / people / organisations