



SOUTH DOWNS NETWORK

Working for the best possible National Park

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Via email to: mcz@defra.gsi.gov.uk

21 March, 2013

Dear Madam / Sir,

Response to the Marine Conservation Zones consultation

The South Downs Network is a group of community environmental, conservation and recreational organisations that have come together to work for the best possible South Downs National Park. It comprises nearly 50 organisations, although some of these bodies are networks themselves, so the effective membership is much wider.

The South Downs Network fully supports the designation of an ecologically coherent network of Marine Conservation Zones (MCZ) around the UK. In particular, it welcomes the recommendation to designate the Beachy Head West MCZ and urges the Government to progress this as soon as possible. This area is the most relevant of the proposed MCZs to the South Downs National Park, which has various coastal elements stretching from Brighton Marina through to Eastbourne, the main element of which is the Sussex Heritage Coast, the very first Heritage Coast ever defined.

However, the South Downs Network is concerned that the MCZ sites proposed for designation in 2013 will not in themselves create an ecologically coherent network and the Government needs to do more to progress MCZs in other areas. For example, the South Downs Network is disappointed that the Beachy Head East MCZ which is also relevant to the South Downs National Park and abuts Beachy Head West MCZ is not being recommended for designation. This does not make sense and will undermine the integrity of the MCZ network and the Network urges Government to bring this and other possible MCZs forward as soon as possible.

While the Network is generally supportive of the MCZ proposals, it does have concerns about the size of the MCZ proposed at Beachy Head West. This proposed MCZ is only 500m wide, yet there is a no trawl zone 0.5 miles wide and the existing Voluntary Marine Conservation Area is some 2km wide. Therefore the South Downs Network cannot understand why the Beachy Head West MCZ boundary has been drawn so close to the shore and would like to see its width expanded. On the face of it this appears to be a reduction in protection for the area, which would seem a rather perverse outcome of the designation of an MCZ.

The second area of concern with Beachy Head West MCZ, as proposed, is that it does not include the tidal estuaries of the Ouse and Cuckmere. These are intricately linked to the coastal environment and are important fish spawning and recruitment areas. The South Downs Network questions how an ecologically coherent network can be established in such circumstances and would urge that these areas are included.

Finally, the South Downs Network believes that Defra should remain committed to gathering additional evidence for a wider Beachy Head West MCZ in 2013 to support the designation of the remaining habitats and species recommended by stakeholders as soon as possible. It also wants to see urgent action on gathering additional evidence to progress the Beachy Head East MCZ. In the meantime it would like to see measures taken to ensure that Beachy Head East is protected from further damage and degradation until its future is decided.

If you should you require clarification of any of the above or any further information, please do not hesitate to get in touch.

Yours sincerely

Dr Tony Whitbread

Chair

South Downs Network