



Consultation process on the proposed Port Limits for Outlying Harbours and associated Guidance/Restrictions. Summary of responses and minutes of public meeting.

1. A consultation on the proposed Port Limits for Outlying Harbours and associated Guidance/Restrictions closed on 21 July 2014 and a public meeting was held in the Albert Terminal, Gate 3 on 5 August 2014 at 1830.
2. The table below summarises the comments received and the Jersey Harbours response as amended at the public meeting.

Ser	Proposal	By	COMMENT	JERSEY HARBOUR RESPONSE
1	Grève de Lecq harbour Limits	Chris Le Boutillier President of Greve de Lecq BOA	Revised limits to allow protection for anglers at end of pier and at point E. Also increase area to include slipway and adjacent beach area.	Agreed to both. Limits revised to reflect current area. Once limits adopted in GD 8 gate will be constructed reserved for BOA only
2	Bonne Nuit Harbour Limits		No comments received	Consultation proposal will be adopted
3	Rozel Harbour Limits		No comments received	Consultation proposal will be adopted
4	St Catherine's, Little Catherine's and Archirondel Harbour Limits	Kevin McIlwee Sea Search – Marine Conservation Society	Suggested increasing area of St Catherine's to run from Archirondel straight to Breakwater to protect environment	Acknowledged receipt of email. Explained the process was for moorings and safety of navigation. JH was not minded to increase areas of jurisdiction beyond what it could reasonably manage. FEPA covers areas outside Harbour Limits (see 11b/c below). Post Consultation Note: With summer moorings now in place, a survey of moorings was undertaken by JH indicating that several moorings currently lie outside the proposed area. Line St Catherine's breakwater head to Archirondel to be adopted.
4a		Dean Pitman Member of Public	Concern over vessels speeding above 5 knots in St Catherine's Bay	Establishing harbour limits will help enforce directions on speeding and other safety issues.

5	Gorey Harbour Limits	Ports Executive Team - Ports of Jersey	Increase the area of Gorey limits to include outer moorings north of main approach channel.	Agreed to increase the area as to include outer moorings N or main fairway, where SJH mooring currently laid. Further attention to NE Fairway via Les Arch Beacon which is more frequently used by local boat owners.
6	La Rocque Harbour Limits		No comments received	Consultation proposal will be adopted
7	St Aubin's Harbour and Belcroute Bay Limits		No comments received	Consultation proposal will be adopted
8	St Brelade's Harbour Limits		No comments received	Consultation proposal will be adopted
9	Les Minquiers Main Island Moorings		No comments received	Consultation proposal will be adopted
10	Les Écréhou Mooring Limits	Écréhou Residents Association	Concerns over fishing gear in approach channel	Limits extended to include approach channel.
11	General Comments not specific to one individual harbour – Harbour Limits	Capt S Richard-Dit-Leschery Condor Ferries	Condor has no issues with these proposed limits	Acknowledgement
11a	General Comments not specific to one individual harbour – Pier Jumping / Tombstoning	Kevin Mansell Le Rocquier School	Consideration to remove blanket ban on pier jumping/tombstoning. Suggested: 1. Check the water depth 2. Look out for boats 3. Respect fishermen 4.) Perhaps wear a wet suit 5.) Never jump alone 6.) Enjoy yourself but take care	Acknowledgement of email and points raised. Differentiated between unplanned events which has led to accidents and injuries and organised and risk assessed events which are regarded as Coasteering. Recognised that there are mixed views on this issue and practical difficulties in enforcement. However, the existence of a restriction enables action to be taken where problem becomes a nuisance. There should be a light-touch in its application.

11b	General Comments not specific to one individual harbour – ecological impact	Marcus Binney Marine Biology Section - Société Jersiaise	Broad agreement of proposed limits. Gave detailed paper on Jersey's sub-tidal sea grass with associated maps. Paper attached in Annex A	Acknowledged response and identified areas of interest <ul style="list-style-type: none"> • L'Islet – east side of Bouley Bay • N of Rozel Harbour Pier • South of St Catherine's Pier • Outside moorings at Gorey • Minquires south part of anchorage <p>JH would continue to manage existing moorings in those areas that lie within Harbour Limits with due regard to environmental impact.</p>
11c	General Comments not specific to one individual harbour – control of moorings laid outside harbour limits	Willie Peggie Director of Environment	Method of management of moorings outside harbour limits will need to be considered taking into account: <ul style="list-style-type: none"> • FEPA requirements and effect on environment • Position of mooring • Interference with other legitimate users 	Jersey Harbours is primarily responsible for the Safety of Navigation and the protection of the environment within areas designated as a Harbour. It is, therefore, inappropriate for Jersey Harbours to claim an area of jurisdiction solely on the grounds of protection of the environment where no oversight of the Safety of Navigation is required. This consultation has, however, raised interesting questions with regard to the management of environmentally sensitive areas and how this relates to moorings outside Harbour areas; this is being considered by the Department of Environment.



Barry Goldman CBE
Harbour Master - Jersey Harbours

11 August 2014

This is a response from the Marine Biology Section (Société Jersiaise) to the proposals outlined in the Harbour Limits Consultation Paper.

Introduction

For most of the harbours listed, the limits proposed seem sensible and will undoubtedly meet with the needs of the boat owners and other interested parties. However, it is the view of the Marine Biology Section that in a couple of instances the needs of the local marine environment have not been addressed perhaps as fully they could be. Our concerns focus almost exclusively on the occurrence of seagrass beds within or adjacent to some of the proposed harbour limits.

Seagrass (*Zostera* spp.) is marine flowering plant that can form dense beds in intertidal and shallow marine areas. Jersey's seagrass beds have been extensively studied and are known to be areas of high biodiversity to act as a nursery ground to commercial fish, crustacean and mollusc species. Aside from monitoring work undertaken by our Section, Dr Emma Jackson studied the commercial value (to the fishing community) of Jersey's shallow marine seagrass beds and last year the Environment Dept. undertook a comprehensive baseline study and health assessment of Jersey's intertidal seagrass beds.

It should be noted that all our seagrass species (principally *Zostera marina* and *Zostera noltii*) are subject to Jersey Biodiversity Action Plans and that seagrass beds are a designated priority habitat under the OSPAR Convention, to which Jersey is a signatory.

The quality and extent of Jersey's seagrass beds also forms one of the marine and coastal sustainability indicators as listed in the State of Jersey Report (2005) and Jersey's Integrated Coastal Zone Management Strategy (2009). The state of our intertidal seagrass beds also form an indicator in the Environment Department's Water Quality Framework monitoring within St Aubin's Bay. As such, any plans that infringe upon coastal areas that contain seagrass beds should be considering and reflecting the local and international obligations that Jersey has towards the management and conservation of these habitats.

Figs 1 and 2 outline the extent of Jersey's subtidal seagrass (*Zostera marina*), as measured by Emma Jackson for her 2003 PhD thesis. Fig. 6 outlines the extent of Jersey's intertidal seagrass (*Zostera noltii*) as measured by Louise Bennett-Jones for her 2014 dissertation. With regard to the proposed Harbour Limits and subtidal seagrass beds, we have the following comments to make.



Figure One – Seagrass beds (*Zostera marina*) on Jersey's NE Coast. (Source: Jackson, 2003).

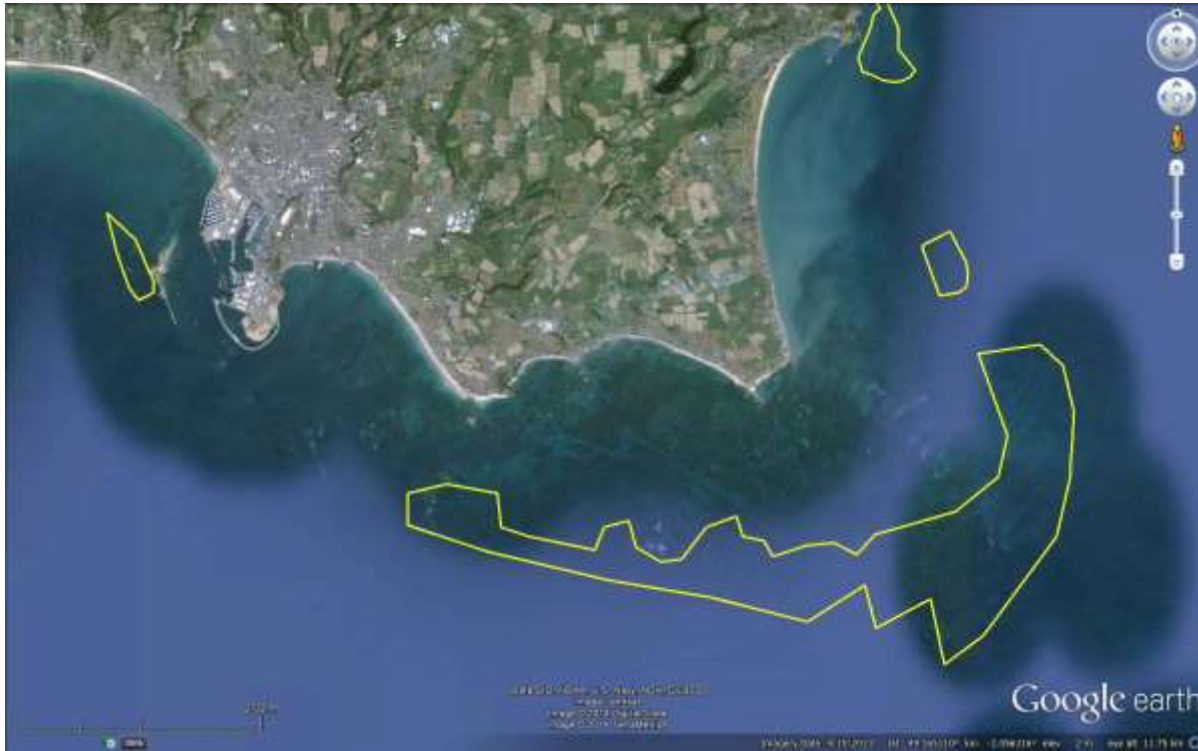


Figure Two – Seagrass beds (*Zostera marina*) on Jersey’s SE Coast. (Source: Jackson, 2003)

St Catherine’s Bay

St Catherine’s Bay contains the largest and densest area of subtidal seagrass around Jersey’s coast. It forms a continuous band (between just above Chart Datum and 5 metres deep) running south from the breakwater to just north of Gorey Harbour (see attached image). The positioning of moorings within the seagrass beds has already led to considerable damage by the chains; this damage is clearly visible on aerial photographs and has even been used in a standard student textbook as an illustration of the damage that mooring can have on this habitat.

We note that the proposed harbour limits for St Catherine’s Bay do not extend far enough east to cover the whole of the subtidal seagrass area (see attached image). In the interests of being able to regulate the placement of mooring and fishing gear within this key habitat, we would request that the harbour limits be expanded as follows (see Fig 3):

Looking at the map in the proposal document, keep Points A, B and C as they currently are, then take a line from the breakwater head directly across to La Crête Point. This would encompass all the seagrass areas within St Catherine's Bay and also off Archirondel.

We think this is probably a practical solution but it does exclude the subtidal and intertidal beds at Anne Port. To include these the harbour limits could extend from the breakwater end to Roche du Lion (i.e. the north point of Petit Portelet). It is acknowledged that this is a large area to regulate.

Moorings equipment has already caused considerable damage to all the seagrass areas within St Catherine's Bay and at Anne Port. In light of Jersey's commitment to the OSPAR and the Convention on Biological Diversity (under which the BAPs for seagrass were implemented) we recommend that new moorings within the seagrass areas should only be permitted if seagrass-friendly mooring equipment is used. It should also be the aim that any replacement moorings should use this equipment as well. See links below for further details:

<http://ro.uow.edu.au/cgi/viewcontent.cgi?article=1074&context=smhpapers>

<http://www.seagrassmooring.com.au>



Figure Three – Seagrass beds (*Zostera marina*) within St Catherine's Bay with the proposed harbour limits in black and the Société Jersiaise's proposed limit in white. (Source: Jackson, 2003)

- **Rozel Harbour**

We would like it to be noted that the proposed harbour limits encompass an area of subtidal seagrass (see Fig. 4). We would request that any moorings within this area utilise seagrass-friendly moorings as outlined above.



Figure Four – Seagrass beds (*Zostera marina*) at Rozel with the proposed harbour limits in white. (Source: Jackson, 2003)

- Maîtresse Île, Les Minquiers

The proposed harbour area delineated at Les Minquiers contains extensive and dense areas of seagrass (Fig 5). We are in the process of habitat mapping the whole of the Minquiers and have concerns over the health of the seagrass there (chiefly due to invasive seaweed species). We would request that any moorings within the seagrass areas use seagrass-friendly anchorages as outlined earlier).

We believe that Maîtresse Île will not benefit from any additional private permanent moorings. The anchorage area is small and the placement of additional mooring in the cove area will force boats to anchor further into the channel south of Maîtresse Île, where the seagrass occurs. Needless, to say, we don't consider this to be a good thing.

Furthermore, and there is already a good deal of discarded mooring tackle buried in the sand on which it is easy to snag an anchor. We suspect that hut owners have in the past established moorings but have not maintained them and, when the chain erodes (as it does very quickly there), they have not removed the deadmen from the sand. To avoid this (and some of the overcrowding issues that have arisen at Les Écréhous) we recommend no further moorings be permitted at Maîtresse Île.



Figure Five – Seagrass beds (*Zostera marina*) around Maitresse Île, Les Minquiers. (Source: Marine Biology Section).

- Intertidal Seagrass

As well as the subtidal seagrass. Jersey has extensive intertidal seagrass beds (the species *Zostera noltii*) on its east and south coasts. Fig. 6 shows the location of these beds.

A full habitat assessment of the intertidal beds at St Aubin, Grouville and St Catherine's Bay was undertaken in 2013. This study found evidence of degradation to the St Aubin's bed (probably because of water quality issues) and extensive damage to the St Catherine's Bay beds because of moorings (beds, 4, 6 and 7 on Fig. 6).

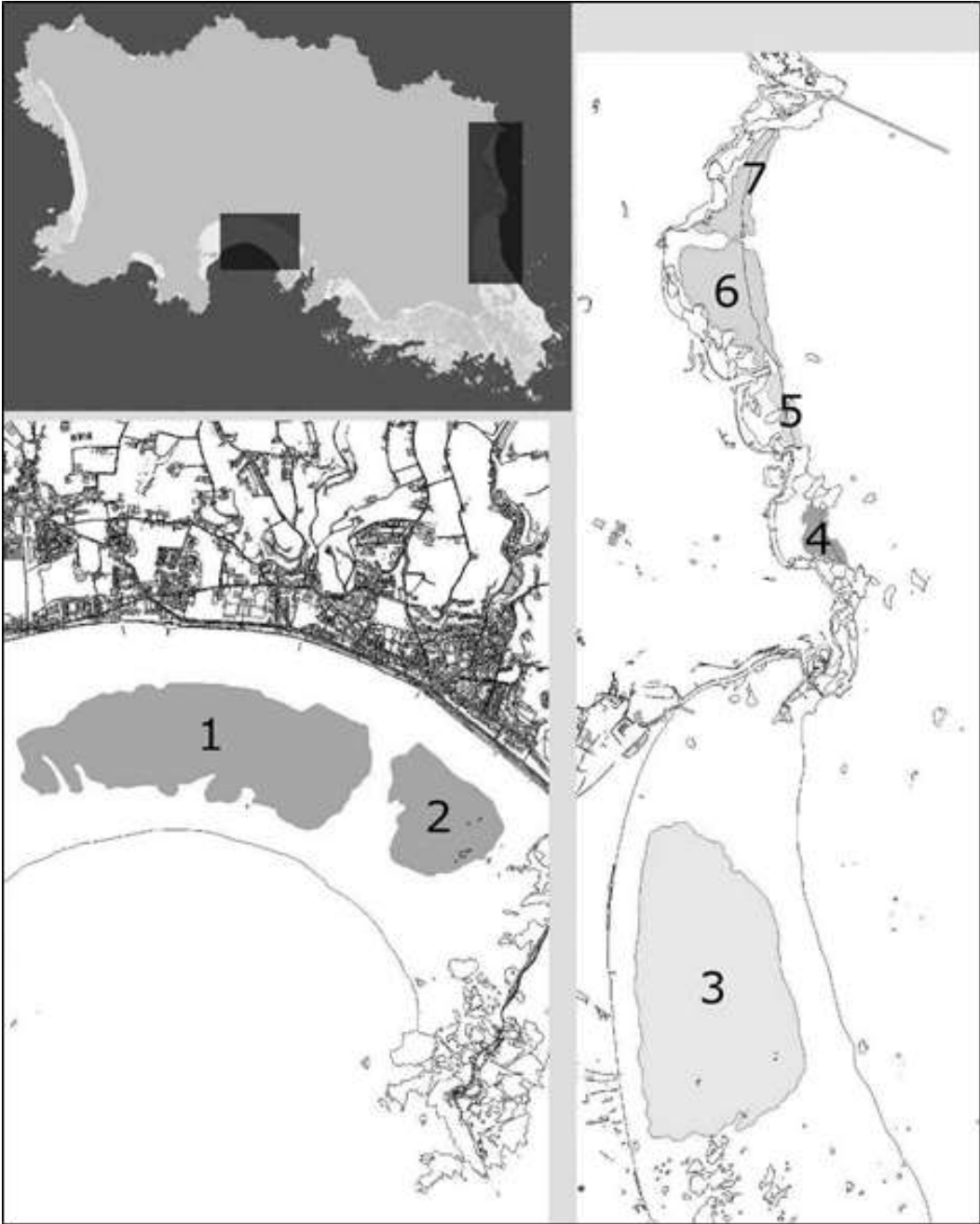


Figure Six - The location of Jersey's Z. noltii beds. (Source: Bennett-Jones, 2014)

The Marine Biology Section (and others) has long been aware of the damage that moorings are doing to the intertidal seagrass beds at Little St Catherine and Anne Port and have raised this issue with Marine Resources previously.

We remain concerned about the damage that is being done to these beds and, as with the subtidal beds, recommend the use of seagrass friendly moorings in areas containing intertidal seagrass. We would also request that no new moorings be permitted within the intertidal seagrass areas at Little St Catherine, Archirondel and Anne Port, Grouville and St Aubin's bays. We also recommend that boat owners remove the chain and rope from their intertidal moorings out of season to help minimise damage during the winter months.

We would particularly like to draw attention to the extensive area of intertidal seagrass in Grouville Bay (area 3 on Fig. 6) which is located in a sheltered area that is heavily used by boaters. We believe that because this area of seagrass lies outside any harbour limits it is vulnerable to the unregulated placement of moorings by individuals.

The ability of people to place a mooring wherever they can outside of harbour areas and regardless of local marine habitats has been of concern to the Section for a while. The 2013 study of Jersey seagrass beds reveal Grouville's to be the most stable and healthiest of them all. We feel that steps urgently need to be taken to preserve the Grouville Bay seagrass from the sort of mooring damage that can currently be observed in Anne Port and Little St Catherine. In short, a means needs to be found to regulate the placement of moorings in the Grouville Bay seagrass area.

Conclusion

The Marine Biology Section is largely supportive of the proposed harbour limits but we feel that this strategy should take into account some of the key habitats that lie within or adjacent to the proposed harbour limits. Chiefly, we are concerned about seagrass beds (*Zostera* spp.), a habitat which is listed under international conventions to which Jersey is a signatory and which forms part of the island's environmental monitoring strategies.

We hope that our comments and suggestions are constructive and not too overbearing and we are happy to discuss any of the points raised. The Section holds the largest collection of marine biological data within the Channel Islands and are regularly consulted about strategies and proposals that may impinge upon the marine environment.