

The Rt Hon Theresa Villiers  
Secretary of State for Environment, Food  
and Rural Affairs  
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**Councillor Tudor Evans OBE**  
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Dear Secretary of State

As Britain's Ocean City, Plymouth City Council takes its responsibilities towards the marine environment seriously and is committed to ensuring that marine matters are placed at the very heart of its decision making. I am therefore writing to DEFRA to seek a reassessment of the way the IFCA fund is formulated, to request that New Burdens Funding is provided to all Councils with statutory Marine Protected Areas within their IFCA and to request that local funding is restored to 2010 levels in order to enable Councils to delivery public services and contribute to adequate IFCA budgets.

Plymouth is one of England's premier fishing ports and in 2017 was the third busiest with £11million worth of fish landings, representing a value of £16million and 13% of all landings (UK sea fisheries annual statistics report 2017). The Council has an exemplar track record in terms of its support for the fishing industry; providing life jackets to fishers in 2018, and supporting the fishing industry through the Brexit process with a Select Committee that takes an overview of the industry.

The fishing industry plays a key part within the city centre, and such is the Council's commitment that it is currently undertaking a £99,000 study into the future for a modern and vibrant fishing quarter within the city.

The waters off Plymouth are some of the most diverse and vibrant of anywhere in the country and as such have national and international environmental designations including Special Areas of Conservation, Special Protection Areas and Marine Conservation Zones. For over twenty years, Plymouth City Council has hosted the Tamar Estuaries Consultative Forum which delivers sustainable management and brings together the competent authorities for the European Marine Site, working in partnership with key bodies including the IFCAs, Marine Management Organisation, Natural England, Queen's Harbour Authority, Environment Agency and local and harbour authorities.

Such is the strength of feeling towards the marine environment, that in 2019, Plymouth City Council declared its intention to create the UK's first National Marine Park in order to showcase the city's unique marine assets and to deliver economic, environmental and social benefits whilst contributing directly to sustainable development.

### **Funding Formula**

Plymouth takes its responsibilities with respect to fishing very seriously and has a long history of sustainable management through its involvement with the Devon Sea Fisheries Committee, which was established in 1892. In 2009 it welcomed the creation of IFCA's to bring more effective management of inshore waters and has played a full part in the Devon and Severn IFCA right up to the current day.

Today, the Devon and Severn IFCA (D&SIFCA) is the largest of England's ten IFCA's with two coastlines separated by over 55 km of land, has an area of 4,522 sq km of which 42% are marine protected areas and yet has only four enforcement officers and three environment officers to undertake their work of research and monitoring, creating byelaws and permits and undertaking enforcement. This falls far short of DEFRA's own report of 2009 which identified the projected needs for the D&SIFCA as requiring 25 funded officers. Since then a further 12 Marine Protected Areas have been designated within the district, all requiring further management actions. Apart from the Isles of Scilly, the D&SIFCA has the smallest budget, the least number of officers and the second longest coastline of any IFCA in the country. It has the second highest number of registered fishing vessels and has the highest value of landings.

The 25 Year Environment Plan sets out clearly the need to do more to protect both our seas and marine wildlife and has a vision to ensure that seas return to health and fish stocks are replenished. A sustainable fishing industry is one which is well managed to protect biodiversity and habitats and is fair in its approach to protecting fishers and their livelihoods. The D&SIFCA has an enviable track record of where the IFCA's work hand in hand with the fishing industry with trust and collaboration. However, without the appropriate resources there will never be sufficient capacity to deliver this vision.

Enforcement is a key area of work for the D&SIFCA's with successful convictions sending an important signal to fishers that it does not pay to break the rules. However gathering evidence and building a robust case is extremely intensive work with no guarantee of success. Where convictions are successful, fines are usually small but can be as much as £12,000 with all the monies being returned to central coffers and with only very small amounts being awarded as costs. In the last five years, Plymouth City Council has seen an 85% reduction in the Revenue Support Grant received from Government and therefore finds itself in the position of being unable to accommodate any further increases in funding to the D&SIFCA. The Council therefore requests that the Government undertake a review of the IFCA funding formula to take into account previous assessments of required officers; in addition to sea area, complexity, coastal length, and number of conservation designations; and to allocate Financial Administrative Penalties back to the IFCA.

### **New Burdens Funding**

Of the eight contributing local authorities, Plymouth is one of only two that do not receive any New Burdens Funding towards their contribution towards the D&SIFCA, based purely on their responsible actions in the past in supporting its predecessor the Devon Sea Fisheries Committee. However since the inception of the D&SIFCA's three new European Sites and 13 new Marine Conservation Zones have been created placing significant new pressures on the D&SIFCA.

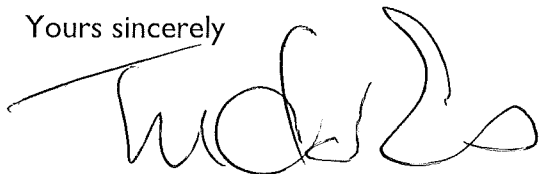
Plymouth City Council therefore requests that New Burden Funding be provided to Councils with enforceable environmental designations including Special Areas of Conservation, Special Protected Areas and Marine Conservation Zones.

**Local Government Funding**

As previously mentioned, Plymouth City Council takes its environmental responsibilities seriously and fully recognises its role in supporting the fishing economy. However with the reduction in the Revenue Support Grant, it will not be possible for the Council to play its full role in delivering on the 25 Year Environment Plan or supporting the D&SIFCA.

I am therefore requesting that local government funding is restored to 2010 levels to enable Councils to deliver public services and contribute to adequate IFCA budgets.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tudor Evans', written in a cursive style.

Councillor Tudor Evans OBE  
**Leader, Plymouth City Council**

cc.

Mike Williams, Chair of Devon and Severn IFCA

Rt Hon Robert Jenrick, Secretary of State for Housing, Communities and Local Government