Licenses and license variations sought during the ReMEDIES project numbers, types, costs, and lessons learnt

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Contents

1. Introduction

Globally, since the mid-1700s, the global coverage of seagrass has decreased by 29%, equivalent to 51,000 km^2 (Short *et al*, 2011; Capistrant-Fossa and Dunton, 2024) with 44% of seagrass beds in the UK being lost since 1936 (Save Our Seabed, 2024). To inform and increase the success of marine nature recovery projects the **Re**ducing and **M**itigating **E**rosion and **D**isturbance **I**mpacts aff**E**cting the **S**eabed (ReMEDIES) project was established. ReMEDIES was a five-year project run between 2019 and 2024 funded through the EU LIFE programme. The project focuses on five Special Areas of Conservation (SACs): the Essex Estuaries, The Solent, Plymouth Sound, Fal and Helford Estuaries and the Isles of Scilly, in eastern, southern and south-western England respectively (see Figure 1, Figure 2, Figure 3 and Figure 4). These protected sites are in unfavourable condition[1], particularly, because of impacts on their sensitive habitats such as seagrass and maerl. One of the key pressures affecting seagrass in these sites is recreational activity.

[1] Unfavourable condition is defined as *"below the thresholds habitats and species are in favourable conservation status"* or as being *"where the criteria for favourable* [condition] *ha*[s] *not been met"* (JNCC and Natural England, 2024, July).

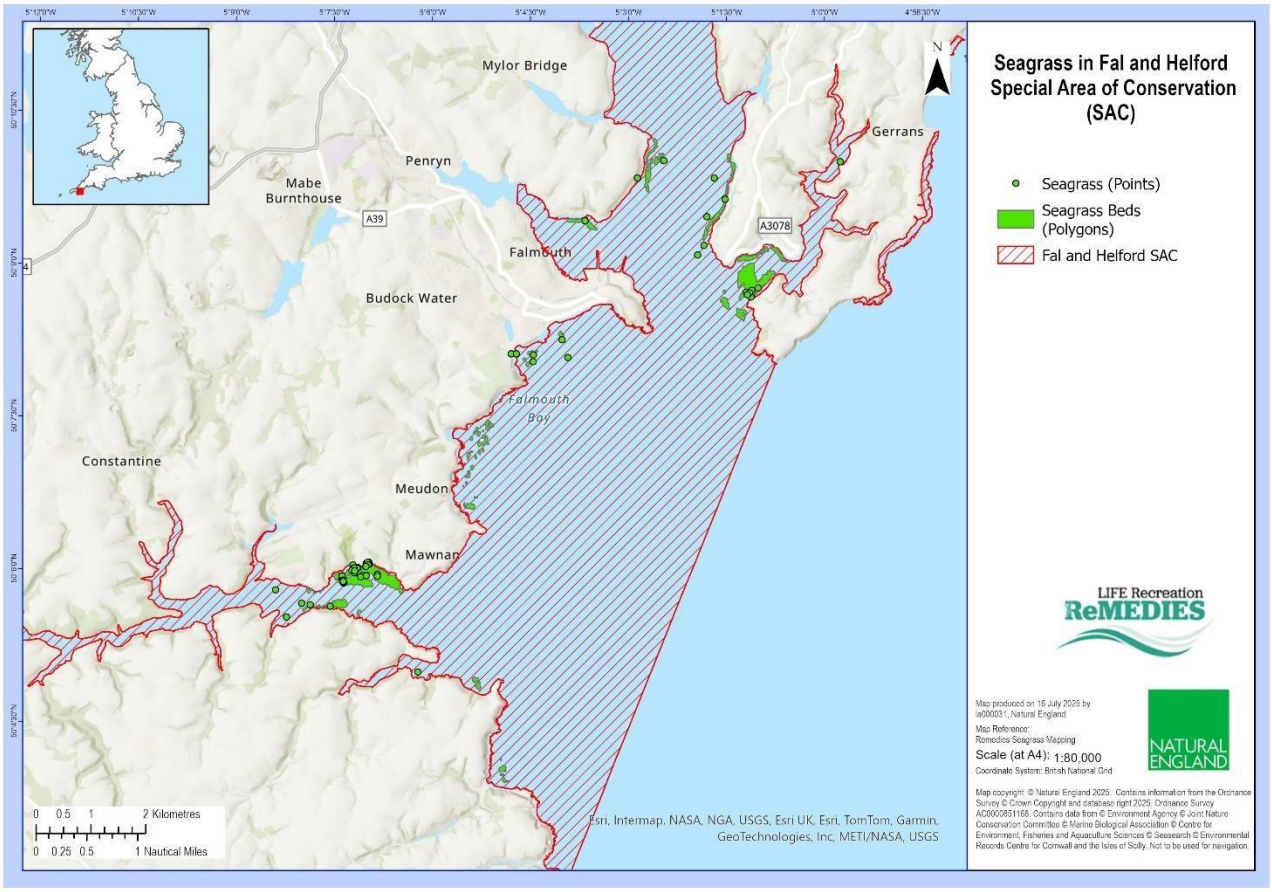

Figure 1: Seagrass beds in the Fal and Helford Special Area of Conservation, one of three sites where ReMEDIES undertook seagrass protection work

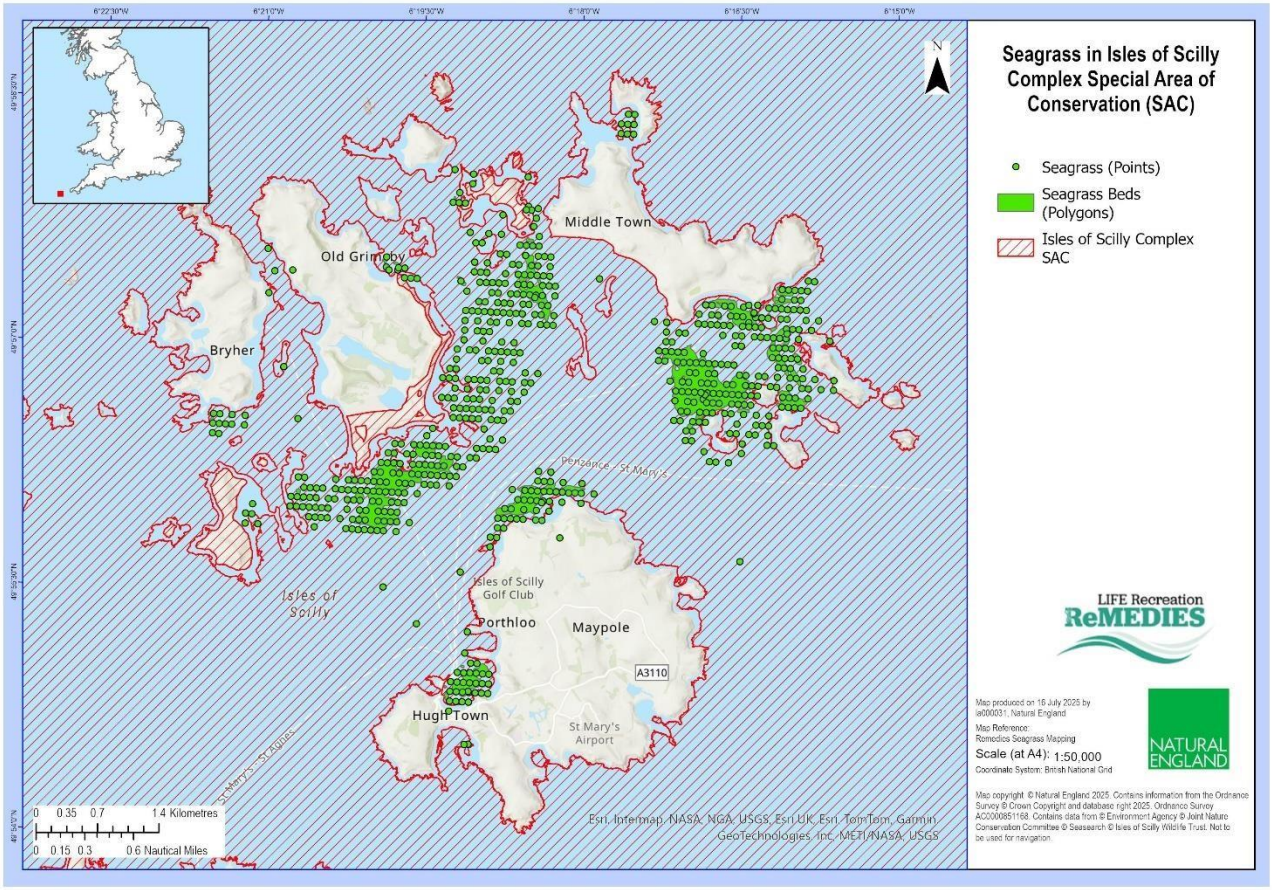

Figure 2: Seagrass beds in the Isles of Scilly, ReMEDIES carried out remote sensing observations on vessel activity rather than active seagrass restoration like that carried in areas such as the Solent or Plymouth Sound

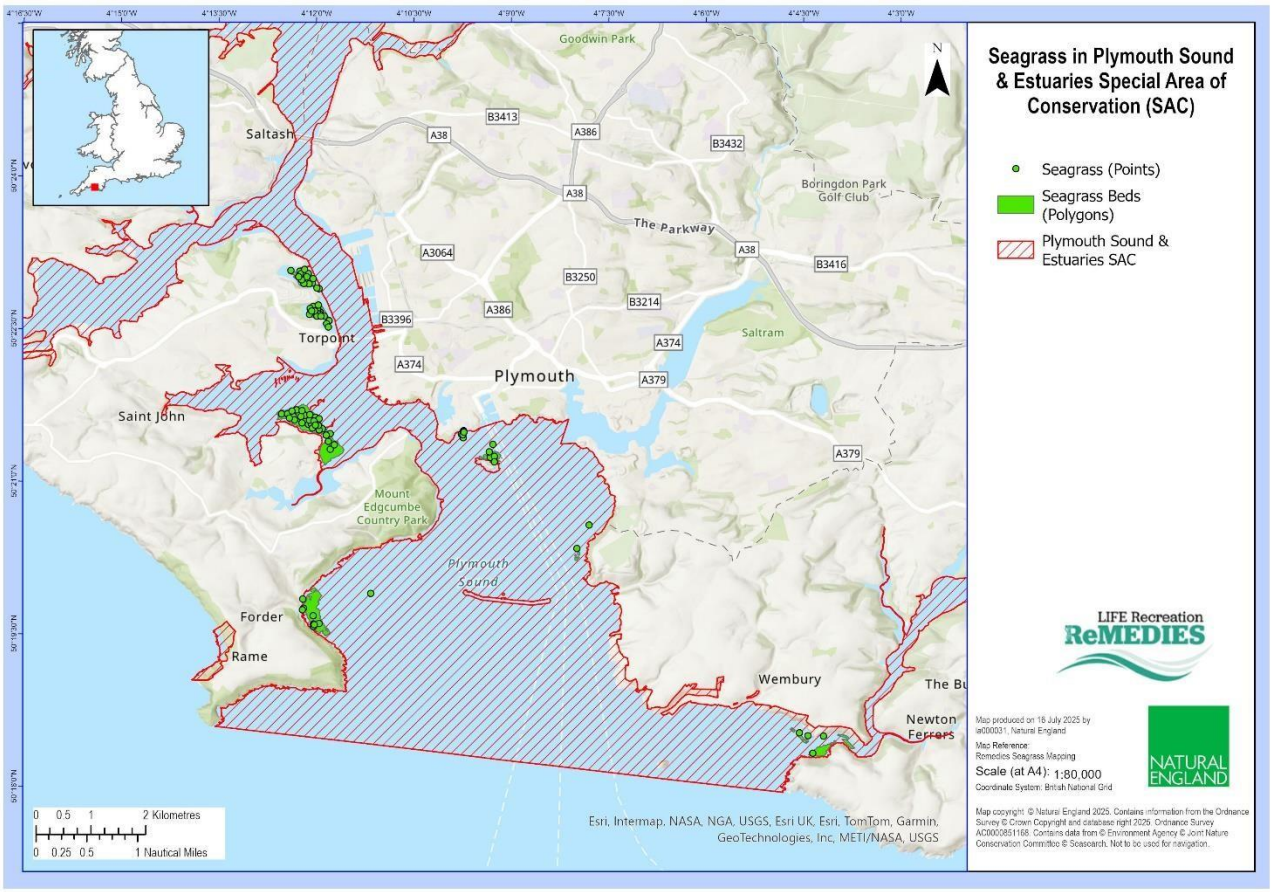

Figure 3: Seagrass beds in Plymouth Sound and Estuaries Special Area of Conservation. ReMEDIES funded both installation of a Voluntary No Anchor Zone and seagrass restoration work

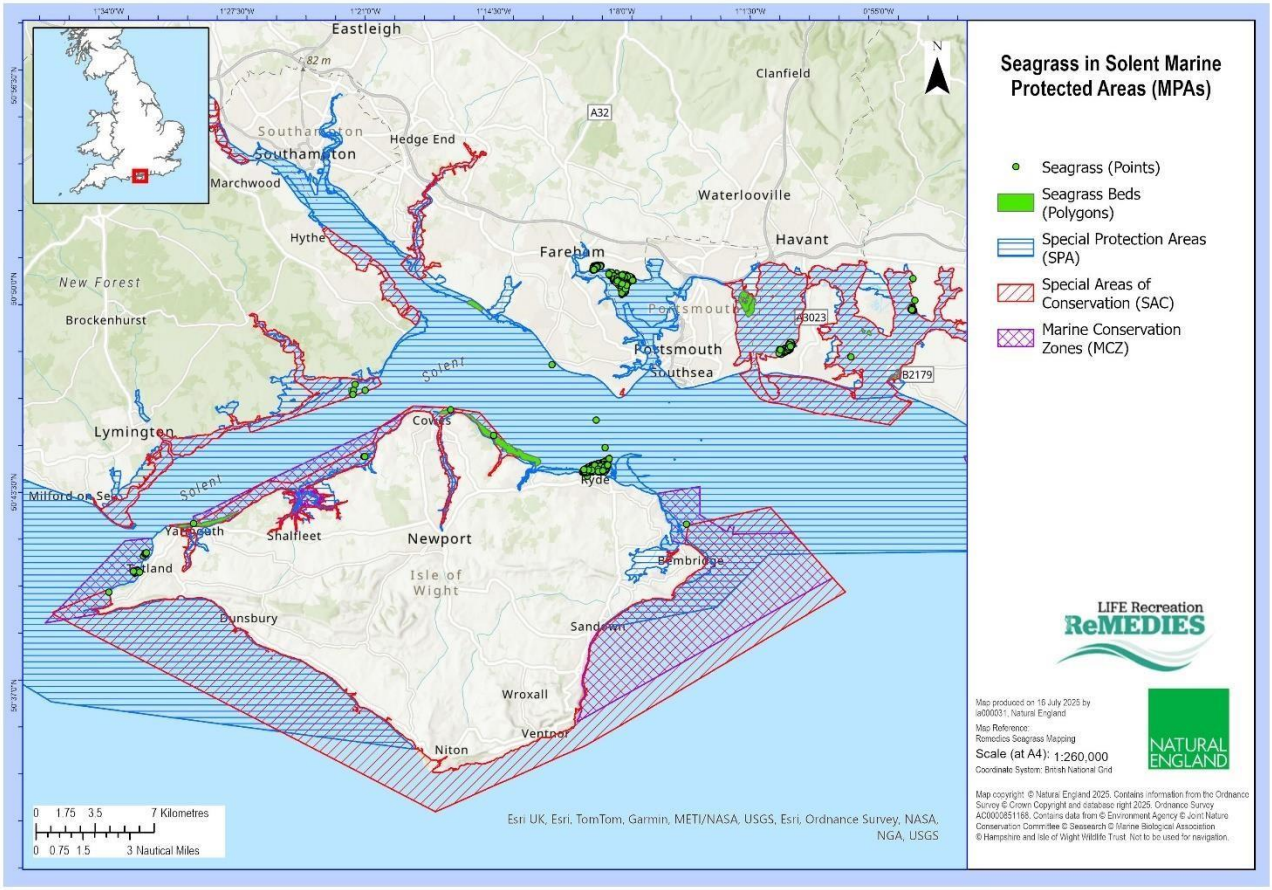

Figure 4: ReMEDIES carried out seagrass restoration in the Solent and installed a Voluntary No Anchor Zone in Osborne Bay, Isle of Wight.

A focus of the ReMEDIES project is to address recreational disturbance pressures associated with recreational anchoring and mooring of boats, whilst promoting behaviour change amongst the recreational boating communities in the five SACs the project works across. Additionally, a key aim of the project was to progress 8ha of active restoration of seagrass, through techniques like seeding the seabed, in two of the SACs.

In the UK, a marine licence or consent may be required to undertake certain activities. Progressing the ReMEDIES project has necessitated the securing of various licences and consents. The Marine Management Organisation (MMO) is the responsible authority for issuing marine licences in England as set out in the Marine and Coastal Access Act (2009) (MMO 2024). Licences or consents may also be required from The Crown Estate (TCE), which manages the seabed on behalf of the Crown, or Natural England if activities are to be carried out on or adjacent to Sites of Special Scientific Interest (SSSI).

The purpose of this report is to share information on the lessons learnt, and experiences of, applying for and securing marine licences for a multi-site, multi-year, multi-partner marine restoration project.

2. Licences and licence variations by activity

The licences and licence variations applied for during the ReMEDIES project by NE and our partner organisations are outlined in Table 1. NE and the Ocean Conservation Trust (OCT) were responsible for securing the relevant licences. Licencing efforts were often split between OCT and NE based on the activity and location. For example, the OCT applied for the initial marine licences for restoration activities to deploy hessian seed bags in Plymouth Sound and the Solent and later varied this licence to include seed pillow deployment for Plymouth with input from NE. NE then led the application for the injection seeding licence with information input from the OCT and led the returns process for this.

Table 1: summary table of licences applied for during the ReMEDIES project. Note: some cells are left blank

Number	Applicant (OCT – Ocean Conservation Trust, Natural England– Natural England)	Licence purpose	Licence type (MMO – Marine Management Organisation, TCE – The Crown Estates)	Reference Number	Location	Estimated time taken to write, submit and get approval/rejection (days)	Estimated time between submission and approval/rejection	Application date	Date licence required by	Approval or rejection date	Cost (£) without VAT	Total costs (£)	Observations
1	OCT with support from Natural England	Deployment from a vessel to deposit objects on the seabed as a novel mechanism at scale to restore the seagrass meadow	MMO marine licence	L/2020/00274	Jennycliff Bay, Plymouth, Devon	5-7	5 mths	02/11/20	06/04/21*	08/12/20 – licence approved	£2,200	£2,200	*Denotes amendment to an existing licence issued in 2020
2	OCT original licence applicant, Natural England applied for licence variation on OCT's behalf	Seagrass restoration using hessian bags	MMO marine licence	L/2022/00087/1	The Solent, Hampshire	2-5	5 mths	18/11/21	07/03/22	18/11/21 – licence approved	£1,400	£1,400	
3	OCT original licence applicant, Natural England applied for licence variation on OCT's behalf	Installation of 6 x Voluntary No Anchor Zones (VNAZ) markers	MMO marine licence	L/2021/00122/2	Jennycliff Bay, Plymouth, Devon	2-5	5 mths	30/11/20	31/05/21*	31/05/22 – licence approved	£200	£200	*Denotes amendment to an existing licence issued in 2021
4	Natural England	Seagrass restoration - commencing works	TCE licence	20015258	The Solent, Hampshire	2-5	1.5 mths	09/02/22	14/03/22	15/03/22 – licence approved	£850	£850	
5	Natural England	Installation of seagrass restoration site markers and VNAZ markers	MMO self-service marine licence	L/2022/00121/1	The Solent, Hampshire	2-5	1-2 days	22/03/22	22/03/22	22/03/22 – licence approved	£50	£50	

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6	Natural England	Installation of 2 x Advanced Mooring Systems (AMS) Marker Buoys and direct planting into the seabed	MMO self-service marine licence	L/2022/00418/1	Helford Estuary, Falmouth, Cornwall	2-5	1-2 days	20/09/22	20/09/22	20/09/22 – licence approved	£50	£50	
7	Natural England with OCT technical input	Planting seagrass by direct seed injection into the seabed using hydroseeding agar method	MMO marine licence -	L/2023/00137/1	Adjacent to Needs Ore Point, within the Solent, Hampshire and Plymouth, Devon	2-5	5-6 mths	05/12/22	22/05/23*	22/05/23 – licence approved	£1,400	£1,400	
8	Natural England on behalf of OCT	Installation of coir planting pillows for seagrass restoration	MMO marine licence – original licence	Variation 3 – licence number L/2021/00122/3 part of MLA/2020/00542/3^	Jennycliff Bay, Plymouth, Devon	2-5	4.5 mths	16/01/21	06/04/21* – original licence issued	05/06/23 – licence variation approved	£3,770	£3,770	*Original marine licence issued in April 2021 followed by a later marine licence variation which was issued in June 2023. ^Licence case number refers to both the Solent licence applications and Plymouth licence applications.
8a	Natural England on behalf of OCT	Installation of coir planting pillows for seagrass restoration	MMO marine licence – licence variation	Variation 3 – licence number L/2021/00122/3 part of MLA/2020/00542/3^	Jennycliff Bay, Plymouth, Devon	2-5	4.5 mths	22/06/23	07/07/23	N/A	£893	£893	^Variation 3's cost is also incorporated into the overall cost of row 8

Number	Applicant (OCT – Ocean Conservation Trust, Natural England– Natural England)	Licence purpose	Licence type (MMO – Marine Management Organisation, TCE – The Crown Estates)	Reference Number	Location	Estimated time taken to write, submit and get approval/rejection (days)	Estimated time between submission and approval/rejection	Application date	Date licence required by	Approval or rejection date	Cost (£) without VAT	Total costs (£)	Observations
9	Natural England on behalf of OCT	Extension until Oct 2024 because licence due to expire May 2022	MMO marine licence – variation of an existing licence	Variation 1 MLA/2020/00542/1	Adjacent to Needs Ore Point, within the Solent, Hampshire and Plymouth, Devon	2-5	1 mth	30/11/20	06/04/21 - original licence issued	31/05/22* – licence variation approved	£200^	£200	*Denotes variation required as the initial licence was time limited. Uncertainty regarding lead applicant for licence application resulted in delays. ^Variation 1's cost is also incorporated into the overall cost of row 8.
10	Natural England with OCT technical input	Request to alter planting technique	MMO marine licence – variation of an existing licence	Variation 2 MLA/2020/00452/2	Adjacent to Needs Ore Point, within the Solent, Hampshire and Plymouth	N/A*	N/A	01/09/22	N/A	N/A	N/A	N/A	*Withdrawn to enable further exploration of seed media suitability
11	Natural England	Installation of VNAZ	MMO self-service marine licence	L/2024/00072/1	Osborne Bay, Isle of Wight	2-5	1-2 days	26/02/24	26/02/24	26/02/24 – licence variation*	£50	£50	*Denotes amendment to an existing licence issued in 2022
12	Natural England	Licence to install and use works	TCE licence	25127	Osborne Bay, Isle of Wight	2-5	10 days	11/03/24	20/03/24	11/03/24 – licence variation	£1	£1	
13	OCT	Seed Collection on associated Seahorse Habitat	Wildlife licence	L/2023/00055	Plymouth Sound, Solent Maritime SACs, Gillians harbour, Swanpool, Men-aver beach, Maenporth,	1-2	6 mth	08/08/22	31/12/22	17/02/23	£0	£0	Licence was delayed since project applied for all English waters

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					Looe Millandreath,Portland harbour								
14	OCT	Seagrass seed collection	Scientific exemption from requirement for a marine licence	EXE/2024/00171	Plymouth Sound, Solent Maritime SACs, Gillians harbour, Swanpool, Men-aver beach, Maenporth, Looe Millandreath,Portland harbour	1	5 days	22/07/24	26/0724	N/A	£0	£0	This exemption only applies if it is below 1 m³ of material collected. Fortunately, given the small size of seagrass seeds, ReMEDIES did not exceed this condition for scientific exemption. Larger quantities would require a full marine licence.

3. Lessons learnt and recommendations

Successful delivery of marine restoration projects such as ReMEDIES depends not only on ecological outcomes but also on the effectiveness of planning, coordination and adaptive management. Throughout the course of this project, several valuable lessons have emerged – ranging from regulatory navigation and stakeholder engagement to technical implementation and design and project governance.

This section summarises the key insights gain during the license acquisition lifecycle. Each lesson is presented with its context, underlying causes, and observed impacts, followed by actionable recommendations aimed at improving the design and execution of future marine restoration efforts. These reflections aimed at supporting continuous learning across the sector and to inform best practices for similar initiatives in the UK and overseas.

By documenting both challenges encountered and the strategies which proved most effective, this section will contribute to a growing body of knowledge that can enhance the resilience, efficiency, and ecological success of future restoration projects.

Lesson 1: Unclear licensing responsibilities delayed marine restoration licence applications and approvals

- **Context:**
  - During the planning and preparation phase for ReMEDIES restoration work, an assortment of licenses was needed before restoration work could commence. This included securing land-owner permission (e.g., Osborne Bay, Isle of Wight) and MMO marine licences. While self-service MMO marine licences can be approved within days, full MMO marine licences require more time and documentation.
- **What happened:**
  - Several marine licence applications were delayed or required variations due to expiration or incomplete submissions, a consequence of planning restoration work commencing before a licence was secured. This disrupted the planned restoration timeline, leading to extra work on behalf of the lead partner, Natural England.
  - Delays occurred because essential supporting information for licence applications was not submitted on time. Additionally, responsibilities for securing and managing licences were not clearly assigned within the partnership.
- **Impact:**
  - The failure to provide accurate information in a timely manner, as stipulated by the MMO in a licence's return (MMO, 2024) caused delays to the restoration activity. Consequently, there was a greater administrative burden because of the need to apply for licence variations.

- **Lesson:**
    - Early-stage planning must include clear identification of restoration sites, required licences and permissions and responsible parties. Defining roles and responsibilities within the partnership is essential to avoid delays and ensure compliance with regulatory requirements.
- **Recommendation:**
    - Future projects should conduct early site assessments to identify all necessary permissions and regulatory bodies. Assign a single partner to lead on licensing, supported by timely information-sharing from all stakeholders. Consider using self-service MMO licences where appropriate to streamline approvals.

Lesson 2: Lack of early clarity and evidence can delay licence approvals

- **Context:**
    - The project planned to use several different seagrass planting techniques including a novel seed-based method. However, this new approach was ultimately not implemented due to regulatory concerns.
- **Why it happened:**
    - The novel planting technique was not implemented due to unresolved concerns about its ecological suitability. Additionally, insufficient information was provided to Natural England to support a ‘Likely Significant Effect (LSE) test’ under the Habitats Regulations Assessments (Department for Environment, Food & Rural Affairs, Natural England, Welsh Government and Natural Resources Wales, 2023).
- **Impact:**
    - Extended discussions about the novel technique’s suitability delayed decision-making and ultimately led to the withdrawal of the licence variation. This limited the project’s ability to innovate, reflecting the importance of piloting new techniques prior to implementation at scale.
- **Lesson:**
    - Clearly define and justify all proposed techniques during the project design phase. Ensure novel methods are supported by sufficient evidence to meet regulatory requirements so they can withstand the scrutiny from statutory bodies.
- **Recommendation:**
    - Future projects should confirm the suitability of all proposed techniques early in the planning phase. Where novel techniques are proposed, conduct pilot studies and gather supporting evidence to facilitate regulatory approval. Engage, early in the design process, with statutory bodies to align expectations and avoid unnecessary delays.

Lesson 3: Inadequate license planning increased project costs and delays

- **Context:**
  - During the project, several license variations were required due to earlier than-expected expirations and the introduction of a new planting technique. These changes necessitated additional administrative work and regulatory approvals.
- **Why it happened:**
  - Variations were submitted after work had already started because the original licenses did not allow sufficient time for completion. This oversight led to additional administrative tasks and delayed restoration activities.
- **Impact:**
  - License variation fees and administrative delays increased the project's time and financial burden. In some cases, delays led to license withdrawals. The MMO require at least three months' notice to process variations, making early planning essential.
- **Lesson:**
  - Projects must scope out licensing requirements early, including timeframes, costs, and potential variations. Licence applicants should clearly define techniques and timelines during the project design phase to avoid costly delays whilst ensuring regulatory compliance.
- **Recommendation:**
  - Future projects should compile a comprehensive list of required licenses and associated evidence early in the planning process. Where possible, consolidate multiple activities into a single license application per site. Pilot novel techniques in advance to reduce the risk of mid-project changes.

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