

Stephen Eades
Marinet
Allington House
Chippenham
Wiltshire, SN14 6LN

(by e-mail only)

18th November 2008

Dear Mr Eades,

Re: Response to internet posting “UK Government grants aggregate dredging licence for Area 481 on the east coast” on www.marinet.org

I write on behalf of United Marine Dredging Ltd and Van Oord UK Ltd, the co-licensees of Area 481, in response to the above. To aid clarity I will address the points of concern in the order they were made in your posting.

Dredging permissions granted regardless of evidence and reasons as to why they should not.

In the production of the EIA and further supplementary information, we presented evidence to the regulators (MFA) and their advisors (Cefas, Natural England etc). Using this information and their own they concluded that dredging in this location would have an acceptable impact on the environment. We are unaware of any evidence to the contrary and would urge you, if such evidence exists, to make it available to ourselves and the MFA.

The implication that the permission procedure to extract marine aggregates is conducted as a foregone conclusion is misplaced. A large volume of work was undertaken on this and all applications to ensure the environmental impact of extraction is clearly understood. I refer to Marinet’s comments made on 13/11/2003 in reference to Area 481, in which it the quality of the EIA produced to support the application was commented on;

“...this is by far the most detailed and comprehensive document regarding the many impacts of offshore aggregate dredging that we have ever encountered” (P.Gowen)

In order to increase the transparency a ‘report of consultation’ was produced and circulated as part of the application process. This document summarised the consultations, EIA, Coastal Impact Study and supplementary information that was prepared in support of the application. To further your understanding and reduce your suspicions of the licensing procedure, I would encourage you to research the MFA’s website where a comprehensive guide to the licensing is given.

The King's Lynn Vessel Owners and Skippers Association noted that this site is adjacent to an extensively fished area. Concern was expressed that aggregate dredging and wind farms in this area are squeezing inshore fishermen out of their traditional fishing grounds.

As per comments (16) in the MFA's decision letter, the association's concerns were addressed to their satisfaction by surrendering a section of Area 197 to the north west of 481. Your comments are therefore misleading.

Natural England and the RSPB also raised a concern that the dredging site is a foraging area for the seabird, the sandwich tern, and that the dredging site is close to the North Norfolk Special Protection Area which supports around one-quarter of the UK population of this seabird.

Again these concerns were comprehensively addressed by the supplementary information and the addition of a further benthic survey. These were presented at the time of application and subsequently outlined in the MFA's decision letter (12) thus;

12. Following the addition of benthic surveying in year 2 of dredging within the Schedule of Conditions Natural England and the RSPB have no further issues with aggregate dredging at Inner Dowsing.

Your comments are again deliberately misleading and designed to put a false case to the reader that Natural England and the RSPB objected to the issuing of the permission. This clearly is not the case.

Sediment flow across The Wash to our Norfolk beaches would be further reduced by retention and capture by the dredgers

As outlined in the answer to Pat Gowen's question at the Anglian Offshore Dredging Association open day on 26th September; "independent geological evidence clearly demonstrates that the aggregate deposits are relict (ie. formed in environments and by processes no longer prevailing), being formed in Ice Age fluvial environments and are not therefore part of the coastal sediment system".

The evidence we have presented has been clearly stated and the regulatory authorities have issued the permission on the basis of careful consideration. We therefore find your postings misleading and would ask that they are redressed.

Yours sincerely,



Nicholas Corne
Licence Development Co-ordinator
United Marine Dredging Ltd

cc. Andrew Bellamy (UMD)
Paul Hesk (Van Oord)
Alan Dell (MFA)
Laura Tolhurst (MFA)