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Dear Kathleen Mongan,

**Consultation response to dredging applications: MLA/2014/00346 (Area 296) and
MLA/2014/00354 (Area 494) for applicant: Tarmac Marine Dredging Limited**

In line with our many previous objections to the issue of licences for offshore aggregate dredging, MARINET wishes to oppose this latest dredging application.

As an NGO, our resources are limited. Despite this, we have up to now thoroughly scrutinised each application which we have commented upon and raised a detailed list of all the relevant issues.

However we note that MMO never sends us an evaluation of the issues which we have raised in respect of the application. Instead we are sent a standardised, anodyne reply that is exactly the same as that sent to all other respondents.

We find this method of determining licence applications to be profoundly unacceptable, with the implication that the issues we raise are not evaluated at all and applications are simply rubber-stamped.

To avoid wasting our time and energy further, we are reluctantly sending a standardised response to this consultation, raising all the issues that we believe are true of dredging applications in general.

The fundamental grounds for our opposition to the issue of this licence are identical to those given in fine detail when responding to previous applications, two comprehensive examples of which may be seen by visiting:

<http://www.marinet.org.uk/campaign-article/further-objection-to-mmo-licensing-further-dredging-off-great-yarmouth-15th-nov-2013>

and <http://www.marinet.org.uk/campaign-article/objections-to-dredging-licence-renewal-offshore-to-great-yarmouth>

Our abbreviated grounds of objection are:

- 1) Coastal erosion and the impact on the shoreline following offshore dredging: There is plenty of evidence to support the correlation between the increased amounts of seabed material removed by offshore dredging and the recent accelerated loss of sand from our beaches and consequential

coastal erosion. For details, see <http://www.marinet.org.uk/campaign-article/dredging-induced-coastal-erosion>

- 2) These effects include the loss of depth in beach sand and the consequent undermining of dune systems and sea defences. This is particularly significant at this time of climate change because climate change is itself inducing a worsening in erosion, and is leading to a rise in sea levels – all against a background of ‘Managed Retreat’ policies in Shoreline Management Plans, which leaves many vital parts of the coastline undefended. The associated economic cost to the local community and nation should be recognised.
- 3) The lowering of the sea bed which results in deeper offshore sea depth, which in turn increases wave height at the shoreline and promotes gravitational mobility and movement of sand from shoreline to the excavated pits, particularly when storms disturb the deeper offshore areas, so further stimulating coastal erosion.
- 4) The environmental and ecological damage resulting to the sea floor by stripping the seabed of its flora and fauna to leave a marine desert devoid of a viable life-supporting ecosystem.
- 5) The entrapment and destruction of large numbers of small sea bottom-living fish by the suction process. This reduces the number of fish that would otherwise mature and add to vital fish stocks.
- 6) The smothering of the down-tide seabed beyond the confines of the dredging zone brought about by the dredgers discarding unwanted dredged materials which settle and destroy life on the sea floor over an extended area.
- 7) All the issues above lead to a decline in the general quality and structure of the marine ecosystem
- 8) Environmental Impact Assessments (EIA) continue to employ data based upon computerised models created from speculative association of outdated distant findings. The MMO should insist that applicants must use recent specific empirical data measured at the application site.
- 9) Failure by the MMO to check the validity of empirical data used in computerised models, and wave models in particular.
- 10) Failure by the MMO to require applicants to reference the forecasted recovery of the site once dredging has ceased to empirical studies and data drawn from sites of a comparable nature where dredging has already ceased.
- 11) Failure on the part of MMO to insist that sand tracking studies of the migration of shoreline material to the evacuated pits should be included in the data provided by the Environmental Statement (ES). Such studies are essential in any EIA, as they would reveal the actual mobility and transport of the original shoreline material.
- 12) Failure on the part of MMO to insist, as a condition of consent, that the applicants adopt technology which can reduce the loss of marine life at the dredger's suction head, such as that devised by Ray Drabble, marine engineer. This technology can greatly minimise the by-catch of fish and marine life (and thus their mortality) when attached to suction dredgers used by the offshore marine aggregate industry. See <http://www.marinet.org.uk/campaign-article/technology-to-assist-fauna-friendly-marine-dredging> for details.

We would also like to make the following additional points, while recognising that they may be considered to be beyond the scope of each individual dredging application consultation:

- 13) Failure by applicants to adequately assess alternative sources of aggregate e.g. recycled quarry waste, etc.
- 14) Failure by the MMO to evaluate the sustainability of the sale overseas of aggregate dredged in UK waters, thus depleting our own scarce non-renewable resources.

Yours sincerely

S. D. Eades
On behalf of Marinet.