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5th November 2002

For the attention of: Roger Orpin, Senior Scientific Officer, Minerals and Waste Planning,
Zone 4/A1, Eland House, Bressendon Place, London SW1E 5DU.

Dear Mr. Orpin, Minerals Extraction : Area 457, Liverpool Bay.

Thank you for your letters of 19th September and 8th October 2002.

Please find attached a copy of our submission to Westminster Gravels Ltd's consultants, Environmental Resources Management, in respect of the company's application to dredge sand from Area 457, Liverpool Bay.

We would ask you to note that we do not believe that the company has, through its Environmental Statement, demonstrated a need to extract sand from Area 457. Further, we would ask you to note that Area 457 is important with regard to the spawning and nursery needs of commercial fish species within Liverpool Bay and the Irish Sea in general. The Environmental Statement admits that the importance of these spawning and nursery areas in Area 457 within the overall context of the Irish Sea fishery is unknown, and that dredging is likely to damage the spawning and nursery within Area 457. We regard these matters as significant and central to the determination of a Government View on this application and, if a licence were to be granted, the extraction of sand should be limited to the 2½ month period from mid-September until late November in order to protect the spawning and nursery needs of the Irish Sea commercial fishery.

We also ask you to note that the Environmental Statement gives very limited study and evaluation to pollution issues arising from extraction of sand from Area 457. The Environmental Statement makes no analysis of metal levels in the sediments within Area 457, despite acknowledging that general information about metal levels in Liverpool Bay indicates that these levels will be elevated. Area 457 is adjacent to the Dredged Spoil Dumping Ground from the Mersey estuary where the metal levels in sediment are very high. Further, the Environmental Statement gives no consideration in any form to the presence of artificial chemicals in the sediments of Area 457 (the Mersey estuary has received waste discharges from the chemical industry for a great number of years, and these discharges involve a complicated list of toxic artificial chemicals). In addition, the Environmental Statement gives no consideration in any form to the presence of radionuclides, including transuranic radionuclides (Americium, Plutonium) in the sediments of Area 457 (the Irish Sea is known to have significant concentrations of radionuclides in its sediments as a result of discharges by the nuclear industry over the past 50 years).

Accordingly, we ask you to consider these pollution issues carefully when determining a Government View on this application. It is our opinion that no licence to extract minerals from Area 457 should be granted until these pollution issues have been properly quantified and evaluated.

With regard to your letters of 19th September and 8th October, we assume that MARINET is now recorded as a consultee on your standing list of notification to consultees regarding new applications to extract minerals from marine sources.

In your letter of 19th September you state that we will be informed of applications when they go out to public consultation, and that this will continue until these details are made available on the Office of the Deputy Prime Minister's website. We would prefer to continue to be contacted direct by your office, regardless of this web site. Can you please advise whether you are able to meet this requirement.

Yours sincerely

S. D. Eades

On behalf of
MARINET
Friends of the Earth.