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15th November 2002

For the attention of: Mark Irvine, Principal Consultant, Environmental Resources Management,
Norloch House, 36 King's Stables Road, Edinburgh EH1 2EU.

Dear Mr. Irvine, Westminster Gravels Ltd : Aggregate Extraction, Area 457, Liverpool Bay.

We write further to our letter and submission of evidence dated 30th October 2002 regarding the proposed licence application by Westminster Gravels Ltd to extract marine minerals from Area 457, Liverpool Bay.

We wish to make an additional submission of evidence regarding a point not covered in our submission dated 30th October. We apologise for the omission of this evidence from our original submission, but this matter has only been made recently by one of our members.

The matter concerns evaluation of the proposed extraction of marine minerals, principally sand, from Area 457 upon the current licence to extract c. 200,000 tonnes of sand per annum from the Horse Bank, Southport. This site lies in the outer Ribble estuary.

Licence to extract sand from the Horse Bank, Southport, is held by William Rainford (Holdings) Ltd and this licence was recently renewed for a period of 10 years following a Public Inquiry whose findings were publicly reported on 14th February 2002. The Report by the Inspector, A. S. Newman, is referenced by the Planning Inspectorate, Bristol, as M9/-/9/345. This Report is not referred to in the Environmental Statement prepared by Environmental Resources Management in respect of the licence application for Area 457 by Westminster Gravels Ltd.

The Horse Bank is located within the Ribble Estuary Special Protection Area for Wild Birds (SPA) and is adjacent to the Sefton Coast Special Area of Conservation (SAC). The Horse Bank, which is an extensive sandbank situated in the outer estuary of the R. Ribble, is a key feature in the maintenance of natural coastal defences and in the integrity of the SPA and SAC.

Extraction of sand from the Horse Bank and the environmental impact of this practice is therefore an important issue, and this issue was central to the consideration of the Public Inquiry in 2001 concerning renewal of the licence application held by Wm. Rainford (Holdings) Ltd.

A central conclusion of the Public Inquiry was that "sand removed from the Horse Bank is made good by accretion from offshore" (ref. Inspector's conclusions, section 10.78).

Evidence submitted by the applicant (Wm. Rainford Ltd) asserted that “the Horse Bank is a wave-induced feature and to some extent self-regulatory, which is why sand extraction has had little effect. If bank levels are reduced, more flow is attracted across the area, bringing increased sediment to restore levels. In the future sediment inputs from offshore and longshore may decline enough to alter this pattern, but that is unlikely over a 10 or 15 year timescale.” (Inspector’s summary of evidence, ref. Section 6.34).

The question must therefore be asked, will extraction of sand from Area 457 influence the future sediment inputs from offshore and longshore to a sufficient degree over the next 10 to 15 years to alter the pattern of regeneration of the Horse Bank ? This is an important question because if this pattern of regeneration is altered by extraction of sand from Area 457, then the decision reached by the Public Inquiry regarding the licence held by Wm. Rainford (Holdings) Ltd may no longer be valid, and the commercial rights held by Wm. Rainford (Holdings) Ltd may be damaged. The Environmental Statement prepared by Environmental Resources Management in respect of Area 457 gives no consideration to this specific matter.

It should also be noted that this question of regeneration of the Horse Bank was a principal concern of English Nature in their submission of evidence to the Public Inquiry. English Nature observed that “for the last 30 years sand extraction has been taking place from the Horse Bank at the rate of about 10% of the annual accretion rate for the whole estuary. It can reasonably be inferred that this has a significant effect on the sediment balance between eroding and accreting areas. This has been going on at the same time as removal of similar quantities from the same estuary at Salter’s Bank.” (Inspector’s summary of evidence, ref. section 8.11). It should be noted that Salter’s Bank is adjacent to the Horse Bank, and thus also lies within the outer estuary of the R. Ribble.

The question must therefore be asked: if the pattern of regeneration of the Horse Bank is altered by extraction from Area 457, how will this impact on natural coastal defences and the integrity of the SPA and SAC and their conservation objectives ? Once again, this specific question has not been addressed in the Environmental Statement.

Accordingly, it is our recommendation that no licence be granted in respect of Area 457 until the extraction of mineral resources from Area 457 has been examined and evaluated for its impact on the Horse Bank, Southport and thus, in turn, for its impact on the licence held by Wm. Rainford (Holdings) Ltd and the conservation objectives of the Ribble Estuary SPA and the Sefton Coast SAC.

Once again, we apologise for the late submission of this evidence; and, we would be grateful to receive your confirmation of its receipt by yourself.

Yours sincerely

S. D. Eades

On behalf of
MARINET
Friends of the Earth

