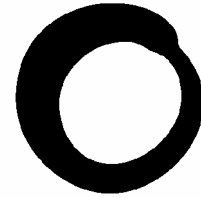




Marine Information Network



**Friends of
the Earth**

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1st March 2004

For the attention of: Matthew Louis, Casework Officer, Minerals and Waste Planning Division,
Office of the Deputy Prime Minister, Zone 4/B1, Eland House,
Bressenden Place, Victoria, London SW1E 5DU.

Dear Mr. Louis, Application by Westminster Gravels Ltd for a Government View: Area 457,
Liverpool Bay: Response to Supplementary Environmental Statement.

Thank you for your letter dated 22nd January 2004 inviting comments on the Supplementary Environmental Statement and Licence Application by Westminster Gravels to dredge up to 1,200,00 tonnes of aggregate per annum from Area 457, Liverpool Bay.

In our original comments dated 30th October 2002 to the applicant's environmental consultants, Environmental Resources Management, Edinburgh, we stated that we did not believe that the applicant had justified the application of the basis of need (i.e. that the commercial market required the aggregate to be dredged from Liverpool Bay); had not demonstrated that dredging would have no impact on pollution levels (metals, complex man-made chemicals and radionuclides) in Liverpool Bay due to the disturbance of deposits of these substances; had not demonstrated that the dredging regime would not impact adversely on the spawning and nursery grounds of commercial fish species in Liverpool Bay; had not demonstrated that dredging would not damage the dynamic system which supplies sand from Liverpool Bay to the coastal beaches, sand dunes and natural sea defence system of the Lancashire coast; and, had not developed an adequate monitoring programme (should a dredging licence be granted) which would ensure that any of these potentially damaging effects would be quickly detected and thus enable, if necessary, a suspension or termination of the licence.

We wish to offer our additional comments to you on these matters in the light of the Supplementary Environmental Statement supplied by Environmental Resources Management (ERM).

Need for Aggregate Extraction from Area 457.

The applicant proposes to supply primary aggregate (building sand for the construction industry and concrete manufacture) and secondary aggregate (infill material and sand for beach

nourishment) to the North West of England. The maximum supply from Area 457 would be 1,200,000 tonnes per annum, and would be supplied in accordance with demand.

We are not convinced that Area 457 needs to be dredged to supply *secondary* aggregate to the market of the North West of England.

In our comments dated 30th October 2002 to ERM, we noted that in the year 2001 an amount of 1,154,088 tonnes of *secondary* aggregate was dredged from existing licensed marine sites in the North West. These sites are operated by companies other than Westminster Gravels Ltd, and the applicant gave no details as to the destination of this secondary aggregate. We asked for further details, given that the applicant claims that to transport aggregate beyond the North West market is uneconomic, and that the tonnage involved is almost equally to the proposed maximum annual extraction level for Area 457.

In a reply received from ERM dated 24th July 2003, the applicant's consultant states that this dredged material in 2001 (1,154,088 tonnes) was used for large construction fill projects and landed in Belfast harbour (795,861 tonnes) and Holyhead (385,227 tonnes). And, in 2002 the supply of secondary dredged aggregate in the North West was 466,705 tonnes and was used for contract fill/beach nourishment schemes at Ross Bay (71,025 tonnes) and Wallasey Dock (395,680 tonnes).

We do not believe, therefore, that there is a demonstrable need for additional capacity for marine dredged secondary aggregate to supply the North West market. Existing licences are clearly able to meet this demand. Moreover, there is no analysis in the original or supplementary Environmental Statements of the capability of terrestrial recycled aggregate and terrestrial construction/demolition waste arising in the North West to meet the needs of contract infill projects. This is a major deficiency. Recycled aggregate and construction/demolition waste is now being increasingly used for infill projects and, given this trend, it appears most unlikely that there is a real need for secondary marine aggregate from Area 457.

With regard to *primary* aggregate (for the building and concrete industry), the terrestrial based reserves in Cheshire (which supplies Merseyside) and Cumbria are considered to be wholly adequate within MPG6 guidelines (i.e. greater than 7 years of existing exploitable reserves) (ref. ERM original Environmental Statement). The only debate centres on reserves in Lancashire.

There is no doubt that terrestrial reserves of primary aggregate do exist in Lancashire and an examination of the area's geology (which the ES has omitted) will confirm this. The only issue is whether these reserves should or should not be exploited in preference to marine reserves.

The applicant's consultant argues that to exploit marine reserves is preferable to exploiting new terrestrial reserves because it will not impact on sensitive landscape or high quality agricultural land.

Whilst this argument has substance, it should be noted that the marine reserve in Area 457 is located in an important spawning and nursery area for commercial fish species (plaice, sole and whiting) and therefore there is economic value attached to this reserve in the same way as there is economic value attached to agricultural land. And, aggregate extraction will damage the economic value of both terrestrial and marine areas in a similar manner.

With regard to sensitive landscape value, it should be noted (see evidence to be discussed later on in this submission) that the offshore seabed sand reserves in Liverpool Bay do supply sand

to the coast of West Lancashire. A large part of this coast is of European grade (Habitats Directive) conservation status, and if this dynamic of sand supply to the coast were to be damaged by marine aggregate dredging in Area 457, then considerable landscape damage would occur.

Therefore, there is a strong argument that it may be preferable to look for new terrestrial primary aggregate reserves in Lancashire, rather than turn to marine reserves. Supply of primary aggregate from existing marine aggregate dredging licences in the North West is already yielding 492,683 in 2001 (ref. ERM original Environmental Statement) and therefore, if it were to be argued that there should be a mix of terrestrial and marine sources of supply to meet overall primary aggregate demand, it is clear that marine sources are already making a significant contribution.

Is there, therefore, a real need for *primary* aggregate from Area 457 ? We do not believe that the applicant has demonstrated this. Existing marine licences and terrestrial licences can meet current demand for primary aggregate and the only reason, in our opinion, as to why the applicant is advancing the case for primary aggregate extraction in Area 457 is because the applicant currently lacks a commercial extraction licence in the North West. Thus, the applicant's argument of need is subjective rather than objective (i.e. simply limited to its own financial motives rather than an objective evaluation of the region's strategic need for minerals).

Accordingly, it is our belief that the applicant has failed to demonstrate to the Government View procedure a clear basis for this licence application on the grounds of need, either for primary or secondary aggregate.

Sediment Movement and Coastal Processes.

An issue of fundamental importance is whether aggregate extraction (primarily sand) from Area 457 will damage the natural coastal processes which supply sand to the West Lancashire coast. Sea defences along this coast, from Liverpool to Fleetwood and Morecambe Bay, are dependent on the easterly movement of sand from the deposits within Liverpool Bay. If this natural dynamic is interrupted or altered, coastal patterns and characteristics could be subjected to profound change and, given that a large area of West Lancashire is dependent on soft sea defences (sand dunes or salt marshes), such change could have profound economic and social consequences.

It is therefore vital that extraction from Area 457 does not interfere with the dynamics of the West Lancashire coastal system.

The applicant's consultant, ERM, was questioned by consultees on this specific issue as a result of evidence and assertions made in the original Environmental Statement. In response, the central thrust of the consultant's assertion and belief is that the dynamic of the West Lancashire coastal system will not change.

We ourselves raised this issue, specifically with reference to sand extraction on the Horsebank at Southport where a recent Public Inquiry has decided to allow extraction to continue (200,000 tonnes per annum) on the grounds that the easterly drift of sand from the deposits in Liverpool Bay regenerate this annual level of extraction. If this were not to be so, then extraction at the Horsebank would have to cease due to consequential coastal erosion in the Ribble estuary and along the Sefton and Fylde coasts. Sea defences in the estuary and adjacent coastlines are of sand dunes and salt marsh, and are of the highest level of conservation importance (SAC and SPA under the Habitats Directive).

Can it be established therefore that aggregate extraction from Area 457 will not lead to problems of coastal erosion ?

The applicant's consultant relies on a Coastal Impact Study conducted by H. R. Wallingford which asserts that the coastal dynamic in terms of sediment (sand) movement will not be interrupted or altered by sand extraction in Area 457.

It should be noted that similar Coastal Impact Studies along the east coast of England in connection with marine aggregate licences granted and operated there over the past thirty years have made a similar assertion. In short, no adverse impact on coastal processes and features (beaches and natural sea defences) has been expected to occur.

This assertion in respect of coastal erosion along the east coast of England is now proving to be very suspect, if not downright incorrect. Recent documented evidence (ref. MARINET Briefing on Marine Aggregate Dredging, 2004) shows that erosion of beaches and natural sea defences is now severe along the Norfolk coast, and the EU EuroSION Report, 2004 (www.euroSION.org) reports:

"Dredging of river and seabed for navigational purposes or construction purposes removes an important amount of sediments. This creates a sediment starvation which is in certain circumstances compensated by (re)activating erosion processes along the shore areas. This has proved to be the case in a significant number of cases including Cove do Vapor (Portugal), the Western Scheldt Estuary (Netherlands and Belgium), Donegal (Ireland), Cavado (Portugal), and North Norfolk (UK)."

Therefore we must take very seriously the possibility that similar consequences could occur along the West Lancashire coast, and that the word of applicant's coastal systems expert (H. R. Wallingford) needs to be carefully examined and subjected to the benefit of an independent "second opinion".

In the Supplementary Environmental Statement for Area 457, the applicant's consultant (ERM) states:

"There are clearly identifiable transport pathways connecting Area 457 to the beaches of the Lancashire coast." (ref. Volume 1, section A3.5.6)

The applicant's consultant believes that dredging of sand in Area 457 will not disrupt these pathways because of a west to east movement of sand on the seabed in Liverpool Bay (termed the "natural sand flux") which is of sufficient magnitude to replenish the amount dredged from Area 457. Indeed the applicant's consultant observes:

"In some years dredging may remove more material than the natural sand flux through the area. Since, in terms of particle size, the underlying sediment contains material similar to the in-transit sands, any deficit in sand will cause erosion of these relict deposits. The supply of sand moving out of the eastern boundary of the licence area and feeding into coastal areas will therefore not diminish (as it will be supplemented by the erosion of underlying sand)." (ref. Volume 1, Section A3.5.6)

It is clear therefore:

1. Surface sand on the seabed of Area 457 (i.e. the sand which will be dredged) is mobile and is supplying the coastal processes along the West Lancashire coast.

2. Levels of dredging in Area 457 may extract, on an annual basis, more surface sand than the amount arriving in the form of natural regeneration.

Can it therefore be assumed that this will not affect coastal processes along the West Lancashire coast ?

This seems unlikely because if sand is extracted from Area 457, the sand arriving in Area 457 in accordance with the west to east dynamic in Liverpool Bay will seek, in the first instance, to replace the amount extracted before moving in a further easterly direction. This is because dredging in Area 457 will cause a depression in the seabed which will need to be filled before the sand “in-transit” can regain sufficient momentum to move on easterly towards the coast.

Thus, a deficit will arise in the natural annual supply of sand from Liverpool Bay to the West Lancashire coast.

The applicant’s consultant argues against this logic. Indeed, in the Supplementary ES (Vol 1, section A3.5.6) it is asserted that the volume of surface seabed sand moving into Area 457 is 850,000 tonnes per annum which is, of course, less than the 1,200,000 tonnes per annum which may be extracted under the terms of the licence. In this circumstance, the applicant’s consultant argues that relict sands (i.e. non-mobile sands below the mobile surface sands) may then be eroded in order to make up this deficiency in the natural annual supply to the West Lancashire coast.

However, this logic does not stand up. If extraction in Area 457 is so great on an annual basis as to remove all surface mobile sand in the dredged areas with the result that relict immobile sand deposits become exposed, then the depression will be of such magnitude as to forestall the natural easterly movement of *all* mobile sand within the dredged area for a period greater than one year. In other words, the natural system supplying sand to the West Lancashire coast would experience total starvation, and no sand would be supplied from Area 457.

Of course, mobile sand would still be supplied from the seabed outside Area 457. However what is the significance and size of Area 457 within the total budget of west to east sand movement within Liverpool Bay ?

The applicant’s original and supplementary Environmental Statements make no attempt to answer this question. It is, therefore, for this reason that the applicant’s current licence application under the Government View procedure must be regarded as seriously deficient in respect of its evaluation of Sediment Movement and Coastal Processes, and why the Coastal Impact Study undertaken by H. R. Wallingford must be reassessed by means of a “second opinion”.

In our opinion, to proceed at the present time to grant a licence to dredge in Area 457 would, in respect of its potential impact on the West Lancashire coast, be unsound and without justification.

Pollution Issues.

In our original submission dated 30th October 2002 to the applicant’s consultant, ERM, we stated that we were not happy that the level of contamination of Area 457 by metals, man-made chemicals and radionuclides had been properly assessed. Indeed, the consultant had done no sampling at all, and was asserting that levels were acceptable merely by inference.

We regarded the failure to conduct sampling as wholly unacceptable in October 2002, and we hold to that belief today. It is inexcusable for an Environmental Impact Assessment to fail to establish the facts.

In the supplementary ES of the applicant's consultant it is stated that this sampling has still not been undertaken, despite the fact that Liverpool Bay is renowned for its contamination due to historic discharges from the chemical industry into the Mersey estuary, due to the dumping in Liverpool Bay of sewage sludge from the Manchester conurbation until very recent times, and due to the well documented official and unofficial discharges of radionuclides into the Irish Sea by the UK nuclear industry.

We find this to be reprehensible, and it is wholly inadequate for the applicant's consultant to assert in the supplementary ES:

"It is considered that the presence of significant concentrations of contaminants within these sediments is unlikely and is why sampling for potential contaminants was not undertaken during the benthic survey." (Ref. Volume 1, section A3.11)

We consider such an attitude to be wholly unprofessional and, in our opinion, no licence should be granted under the Government View procedure until a full and comprehensive sampling regime for metals, man-made chemicals and radionuclides has been conducted throughout Area 457 and, furthermore, until those results have been placed in the public domain and been subject to scrutiny by interested parties under the Government View procedure.

In parenthesis, we would note two points with regard to the need for this pollution sampling regime, its characterisation, and the reasons offered by the applicant's consultant for its absence:

1. In Vol. 1, section A3.11, page A39, the consultant states that the original survey protocol discussed and agreed with CEFAS did not mention the need for such sampling. We would observe that it is not the duty of CEFAS to design the consultant's Environmental Impact Assessment and, even if CEFAS did have a duty to bring such matters to the attention of ERM but did not do so, then CEFAS is equally culpable of the same failure to address the need to establish objective facts in an area of widespread and well-documented historic pollution.
2. In Vol. 1, section A3.3, pages A35-6, the consultant records the total quantities of the longer lived radionuclides discharged by the UK nuclear industry into the Irish Sea. We would observe that the amounts recorded by the consultant in section A3.3 of the supplementary ES are incorrect. For example, the consultant records that the total quantity of Plutonium 239/240 discharged into the Irish Sea is 610 Pico becquerels (a pico becquerel is one million millionth of a becquerel). We can inform the consultant that if he examines a kilogramme of sediment in the Ribble estuary (Broadgate, Preston) he will find Pu 239/240 present in the range of 163 to 197 Becquerels (Ref. Lancashire County Council Radmil Report 1999/2000, Table A. 2.12). We submit that the consultant's characterisation of the inventory of radionuclides present in the Irish Sea is clearly in error, and hence the assessment of their presence in Area 457 also.

Impact on Marine Life.

There is no dispute over the fact that marine dredging causes virtually 100% mortality in a dredge site itself, and that discarded dredged material (fines) from the dredger will smother a wider

area with a fine level of material (sand, mud, shells and pebbles) which, in its turn, may lead to the asphyxiation of sedentary marine life. As such, marine dredging is a form of strip-mining which also impacts upon the adjacent area.

What is more disputatious is the issue of physical and biological recovery. Does a dredged site re-establish its physical character and recolonise in a manner and at a speed to allow one to believe that the practice is, in some form, environmentally sustainable ?

The answer depends, to some degree, on the original physical character of the site. A site characterised by mobile sands, and where such sands will be naturally replaced following dredging, is of a different order from a site characterised by gravel and pebbles which cannot be replenished (due to their immobility in terms of marine currents). In the former, a biological community can be rebuilt in the character of the original once the physical habitat is restored, whereas in the latter case permanent damage and alteration to the character of the marine community is inevitable due to the irreplaceable nature of the physical habitat.

In the case of Area 457 the seabed is covered by a layer of mobile surface sands (this sand is, of course, the target of the licence). A reasonably speedy regeneration of the original biological community, it is argued, may therefore be expected.

While there is a degree of logic in this argument, the following points do need to be noted:

1. The speed of regeneration is asserted by the applicant's consultant in the supplementary ES (Ref. Volume 1, section A4.3) to be "expected within 1 to 5 years". However, the use of the word "expected" should be noted, and the study quoted (Hitchcock et al, 1999) appears to have advanced a hypothesis rather than a fact.
2. Other references cited by the applicant's consultant regarding recovery rates for the biological community (e.g. Kenny and Rees, 1994 and 1996) also suffer from the same deficiency. Namely, their study period extends to two years, and statements about the rates of recovery beyond this period are conjecture.
3. There is therefore no substantial factual basis to the belief that the recovery of biological communities in areas of mobile sand is speedy, or that the recovery reflects the character and structure of the original biological community. In essence, all such statements about recovery are largely hypotheses.
4. Given that aggregate extraction in areas of mobile sands has been occurring in UK coastal waters for over thirty years, this absence of factual monitoring of recovery rates is most reprehensible. Clearly, there are deficiencies in the monitoring conditions attached to existing licences and it is imperative, if a licence were to be granted for Area 457, that this failure to factually monitor the rate of recovery of the biological community in the dredged areas should **not** be repeated.

It is also to be noted that Area 457 lies within the spawning and nursery areas of commercial fish species and, in particular, plaice, sole and whiting. In the original ES, the applicant's consultant stated "*Liverpool Bay is an important spawning and nursery area for a number of species of fish and shellfish. The relative importance of the proposed licence area within the wider Liverpool Bay spawning and nursery area is unknown*". (ref. Section 4.6.5, page 4-16) and "*Important commercial fish and shellfish i.e. sole and scallops, spawn in the area and their eggs will be at risk from smothering by sediment*". (ref. Section 5.2.10, page 5-9).

In the supplementary ES the applicant's consultant states that it has consulted with CEFAS (Ref. Volume 1, section A4.2.1) and that CEFAS studies show that many of the fish species recorded in the Irish Sea are broadly distributed throughout the study area and are comparatively abundant in the UK context.

As a result, the supplementary ES concludes that "*the spawning maps indicate that of the commercial fish species considered, only sole, whiting and plaice are anticipated to spawn within, or in the vicinity of Area 457. In view of the large extent of spawning grounds in relation to the areas within Area 457 for these species it is considered that the proposed dredging activities would have a minor impact on spawning activities.*" (Ref. Volume 1, section A4.2.3, page A47).

Thus, having moved from a position of declared ignorance in the original ES to a state of near certainty in the supplementary ES, is it reasonable to accept the above conclusion of the applicant's consultant that the impact of dredging in Area 457 will have minor impact on commercial fish species ?

The following facts should be noted in an attempt to answer this question:

1. The total tonnage of Marine Fish caught in ICES Fishing Area VIIa (Irish Sea) in 1998 was 33,652,000 tonnes. During the four year period since the annual catch has fallen steadily, and in 2001 was 17,690,000 tonnes. This represents a 47% decline over the four year period. (Ref. Supplementary ES, Vol 1, Table A5.2).
2. The total tonnage of Crustaceans caught in ICES Fishing Area VIIa (Irish Sea) in 1998 was 10,682,000 tonnes. During the four year period since the annual catch has fallen steadily, and in 2001 was 5,936,000 tonnes. This represents a 44% decline over the four year period. (Ref. Supplementary ES, Vol 1, Table A5.2).

Declining fish stocks are in part due to over-fishing. However, as the marine aggregate dredging experience off the east coast of England (Ref. MARINET Briefing, 2004) has demonstrated, dredging destroys the spawning grounds and feeding areas of commercial fish species, thus providing a significant contributory factor to the collapse of fishing stocks in those areas.

It is therefore cavalier and irresponsible for the supplementary ES to assert that dredging in Area 457 will only have a minor impact on the stocks of commercial fish species in Liverpool Bay. Stocks in Liverpool Bay are demonstrably in decline, and damage to an important spawning, nursery and feeding area over a 15 year period (the term of the licence) can only serve to intensify this situation at a time when an urgent strategy of remediation is required.

It also to be noted that neither the original ES nor the supplementary ES has made any attempt to assess the character, size or importance of the meio benthos (marine organisms which will pass through a 500 micrometre sieve but will be retained by a 63 micrometre sieve) within Liverpool Bay, and which is of fundamental importance in the food chain and ecological structure of the commercial fish community.

Accordingly, we conclude that the consultant's assessment in the supplementary ES continues to display the ignorance and disregard for the well-being of the marine community and commercial fish population which was displayed in the original ES, and provides a wholly

unsupportable basis for a conclusion that aggregate dredging in Area 457 can be conducted in a sustainable manner.

Neither the ability of the dredged areas to recover their biological character and structure has been demonstrated in the supplementary ES, nor has the likelihood of sustained damage to parent and juvenile populations of commercial fish species be shown to be an issue without concern. Accordingly, in our opinion, the Government View procedure would be totally wrong to support a dredging licence for Area 457 on the basis of the evidence on the impact on marine life contained in the original and supplementary Environmental Statements.

Terms of the Licence.

It is clear that we believe that this licence application is not justified by virtue of its failure to demonstrate an objective need for the marine aggregate from Area 457. Also, that it is not justified by virtue of its adverse impact on coastal processes and natural sea defences (and related conservation habitats); that it is not justified by virtue of its failure to sample for pollution and thus demonstrate that there will be no adverse impact on the wider marine environment due to the disturbance of historic pollution; that it is not justified by its failure to demonstrate that the biological community in the dredged area can recover to a condition that resembles that of the original community, and that it has failed to demonstrate that dredging will not intensify a pattern of steep decline in commercial fish stocks within Liverpool Bay.

Can the terms of the licence be drawn up in such a way so as to mitigate these serious shortcomings ?

In respect of need for the aggregate, we believe that the decision is absolute. Either the aggregate is needed, or it is not. The applicant's consultant argues in the supplementary ES that dredging of Area 457 will be demand led, and if there is no demand then no dredging will occur.

We believe that this is a false premise on which to proceed. The applicant cannot put in an application on the basis that the demand may or may not materialise. The applicant must be able to show *demonstrable objective* need, otherwise the application is a fiction. We do not believe that the applicant has shown this demonstrable need, and therefore by this criterion the application falls.

In respect of the impact on coastal processes, we believe that the applicant has relied upon errors of logic in order to assert that no adverse impact will occur to the coast of West Lancashire. There is little point in seeking to place a provisional term within the licence in order to try to avoid this adverse impact. This is because it is very likely that the time taken for the natural system to display that a sediment deficit is occurring in the coastal process will be slow and incremental, rather than quick and immediate. Accordingly, this delay will mean that the damage will have already been done (the sediment budget substantially depleted or disrupted) before the order to cease dredging can be issued.

The only way to forestall this eventuality is to be certain from the outset that such adverse impact on the coastal processes of West Lancashire cannot and will not arise. This requires a full application of the precautionary principle which, in turn, means that it is essential that an independent "second opinion" is sought to that of the present consultant and its advisors. And, if this "second opinion" expresses doubts concerning the present consultant's predictions, then supplementary expert advice must be further sought. There is no room for error in this matter.

In respect of pollution issues, the matter is already abundantly clear. A full sampling regime to establish the degree of pollution in Area 457 must be undertaken. Anything short of this is unprofessional and unscientific. Only when these facts are known can any deliberation be given to terms of the licence in this regard.

In respect of the impact on marine life, the precautionary principle requires that very careful thought be given to licensing an activity that could further damage commercial fish stocks which are already in serious decline. If a licence were to be issued, any evidence of continued decline in commercial fish stocks would require that the dredging licence be suspended or terminated for the foreseeable future. Without such a step, an unreasonable state of jeopardy would surround the recovery of commercial fish stocks in Liverpool Bay and the Irish Sea in general.

With regard to the rate of recovery of the marine community in the dredged areas, and the character and structure of the biological community in the years following dredging activity, it is clear that knowledge within the professional scientific marine community is extraordinarily limited. Therefore, if a licence were to be granted, it is essential that the monitoring programme should occur from the outset of the operation and continue on a constant (annual) basis until such time as a clear, factual and scientific knowledge base has been established. This monitoring requirement is not only essential in order to understand the nature and pattern of biological recovery within Area 457, but is also essential in order to inform future aggregate dredging licence applications elsewhere in the UK. A serious knowledge deficit currently exists in this regard, and it is the duty of the UK Government (Office of the Deputy Prime Minister) to take the necessary steps to remedy this reprehensible state of affairs. Finance from the Aggregate Levy Sustainability Fund should be allocated to this specific purpose.

The proposal in the supplementary ES that such a monitoring study should only be carried out after 500,000 tonnes of primary aggregate or 700,000 tonnes of secondary aggregate or after five years (whichever is the sooner) have elapsed, is totally insufficient. It does not meet the need described above, and therefore should be rejected under the Government View procedure as wholly inadequate.

It is also imperative that the annual monitoring regime outlined above should be a public procedure i.e. its full results presented and placed speedily in the public domain.

Conclusion.

We trust that these observations will be of assistance to you in determining the Government's View of the licence application for Area 457. We would be grateful for an acknowledgement of your receipt of these comments and for your advice on how you intend to proceed. Should you wish to receive a copy of the MARINET Briefing on marine aggregate dredging, please let me know.

Yours sincerely

S. D. Eades
MARINET
Friends of the Earth Local Groups.

