



Allington House
Allington
Chippenham
Wiltshire SN14 6LN
Tel. 01249 653972

21st January 2008.

For the attention of: Mr. D. C. Spooner, Regulatory Advisor, Marine Minerals Team,
Marine and Fisheries Agency, 3-8 Whitehall Place, London SW1A 2HH.

Dear Mr. Spooner, Notification of Aggregate Dredging Licence Applications.

Thank you for your letter of 2nd January 2008 which confirmed that MARINET will be routinely notified of the submission of all new dredging applications and all applications for the variation of existing dredging permissions which are determined by the Secretary of State to have a significant effect on the environment and, therefore, require the submission of an Environmental Statement. We thank you for this decision.

Forgive our continued correspondence on this matter, but there is an important matter that continues to require clarification.

The matter in question is your advice to us that you will notify us of licence applications in those instances where the Secretary of State considers there to likely be a *significant effect* on the environment as a consequence of the operation of the licence. In other words, where the Secretary of State considers that there will be no significant effect, we will *not* be informed of new licence applications.

This is no academic matter. This is precisely what happened in the case of the recent new licence application for Area 202/436. The Secretary of State ruled that the issuing of the new licence would have no significant effect, therefore no Environmental Statement was required and we were not informed.

In fact the applicant's consultant did issue an Environmental Statement Update with respect to this licence renewal application and, upon inspection, we found that there is substantial grounds for believing that a significant effect upon the environment may occur as a result of the issuing of a new licence. As you will be aware, we represented our evidence to the Secretary of State and, although a new licence has been issued, our discussion with your Agency about the nature of this evidence and the manner in which it has been assessed is ongoing between ourselves and your Agency.

We therefore believe that it is essential that we are advised by the Secretary of State of *all* instances of aggregate dredging licence applications, regardless of whether a decision has been made by the Secretary of State to require or forego the requirement of an Environmental Statement by the applicant. Only if this procedure is followed can we be certain that instances like that exemplified by the current Area 202/436 licence are to be avoided.

Accordingly, we seek your decision that we will be advised by your Agency of all aggregate dredging licence applications regardless of the Secretary of State's decision on the necessity or otherwise of an Environmental Statement. We note that this facility is already extended to statutory consultees.

Yours sincerely

S. D. Eades
On behalf of
MARINET.