



Marine Information Network
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3rd October 2008.

For the attention of: Bruce Tomlinson, The Anglian Offshore Dredging Association,
c/o Emu Ltd, 1 Mill Court, The Sawmills,
Durley, Southampton, Hampshire SO32 2EJ.

Dear Mr. Tomlinson, Marine Aggregate Regional Environmental Assessment,
Anglian Offshore Region : Scoping Study.

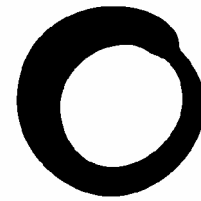
Thank you for your letters of 12th August and 22nd September 2008 which invited MARINET, the Marine Network of Friends of the Earth Local Groups and affiliated individuals and organisations, to comment via your questionnaire on the contents of the forthcoming Scoping Study. Please find our submission enclosed.

May I emphasise the following points made to me by members.

Firstly, the Regional Environmental Assessment must include a tracer study to monitor the movement and final destination of sand taken from the coast and beaches by tides. It is argued by the aggregate companies that “draw-down” between the beaches and the offshore dredging sites does not occur, yet no tracer studies have been undertaken to confirm this assertion. Hence the REA must include a full-scale tracer monitoring study to establish the facts.

Secondly, the Regional Environmental Assessment must include an up to date wave regime model. This model must use offshore, contemporaneous meteorological data in order to ensure accuracy of computation. The wave regime is a key factor in determining the erosive force of the sea upon the coast.

Thirdly, the wave regime model must take account of changes in the depth of the sea between the offshore sites and the coast. In particular, changes in the nature of offshore sandbanks must be included in the computations of this study. For example, Scroby Sands used to be a permanent above high tide sand bank (measuring 1 mile by ¼ mile) prior to the commencement of offshore dredging, but now has no permanent presence above high tide. This is an important change in the calculations of the wave regime, and other offshore sandbanks in the area require to be assessed in a similar manner. The role of offshore dredging in influencing the physical changes in these offshore sandbanks must also be assessed by the Regional Environmental Assessment.



**Friends of
the Earth**

Fourthly, the recovery of the benthos and fisheries in areas where offshore dredging has occurred, but is now ceased, must be fully assessed by the Regional Environmental Assessment.

All of the above are key matters. They must be fully developed and assessed in the Regional Environmental Assessment. Failure to do so will mean that the Regional Environmental Assessment lacks any serious credibility amongst the MARINET membership.

I would be happy to elaborate on any of the above concerns expressed to me by the membership, or on any other matter which I have recorded in your questionnaire.

We look forward to receiving your advice as to how the Regional Environmental Assessment will be delivered.

Yours sincerely

S. D. Eades
On behalf of
MARINET.