



essential materials  
sustainable solutions

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Dear Sir/Madam

Protecting Welsh Seas  
A draft strategy for marine protected areas in Wales

1. Background

1.1 The British Marine Aggregate Producers Association (BMAPA) is the representative trade body for the British marine aggregate sector. The association represents 11 member companies who collectively produce around 90% of the 21.5 million tonnes of marine sand and gravel dredged from licensed areas in the waters around England and Wales each year.

1.2 Marine dredged sand and gravel is principally used by the construction industry, and the marine contribution provides 20% of overall sand and gravel demand in England and Wales and 90% of fine aggregate demand in South Wales. Marine dredged sand and gravel also provide a strategic role in supplying large scale coast defence and beach replenishment projects – over 25 million tonnes being used for this purpose since the mid 1990's. With the growing threats posed by sea level rise and increased storminess, the use of marine sand and gravel for coast protection purposes will become increasingly important.

1.3 In both cases, the marine aggregate sector is dependant upon identifying and licensing economically viable sand and gravel deposits to secure sufficient reserves to maintain long term supply to existing and well established markets. The location of such deposits is extremely localised around the waters of England and Wales, restricted to their geological distribution and their geographical position related to the markets location.

BMAPA is part of the Mineral Products Association, the trade association for the aggregates, asphalt, cement, concrete, lime, mortar and silica sand industries

Registered in England as Mineral Products Association Limited No. 1634996  
Registered at the above address

1.4 At present 1278km<sup>2</sup> of seabed is licensed for marine aggregate extraction, of which around 138km<sup>2</sup> is dredged in a typical year. This represents around 0.15% and 0.016% of the total UK continental shelf area (867,000km<sup>2</sup>) respectively. A further 1931 km<sup>2</sup> of seabed is currently under application or covered by prospecting licence. In this respect, the marine aggregate sector is responsible for managing a significant area of the UK seabed.

## 2. Overview

2.1 As previously stated in our various responses during the Marine Bill development, the marine aggregate sector remains supportive of the proposal to create a network of sites of national nature conservation interest. We also support the intention that such designations would have to take into account socio-economic interests. Given the desire to deliver a more consistent and coherent approach to management and assessment across UK seas, it is essential that proposals for designation be bound by the same robust, evidence-led approach required for marine development licensing.

2.2 The marine aggregate sector welcomes the opportunity to constructively participate in the development of the MPA network. The spatial extent of the sectors interests along with the high resolution data held mean that the industry should be able to make a significant contribution to the successful delivery of the MPA network. However it is essential that the objectives, associated processes and timescales necessary to deliver these are robust, transparent and above all realistic.

2.3 Given the challenge of delivering a coherent network at a regional seas scale, it will be important for the Welsh strategy and approach to coordinate closely with those networks developing in adjacent waters, such as the Bristol Channel and Irish Sea. The strategy approach and process being proposed for Welsh waters is very different to that being adopted elsewhere, and without careful thought about the integration between the two parallel processes there is the very real potential for inconsistency and incompatibility in approach. As an example, a policy or strategy decision in one national area could end up having very profound impacts on adjacent national waters in the regional sea, particularly resulting from the displacement of activities or development pressure. The same applies to the pressure to designate (or not) particular features or habitat types that typify a region. While the policy strategy references the need to adopt a joined-up approach with the English MCZ projects, personal exposure to the Finding Sanctuary project has not indicated much evidence of this taking place to date.

## 3. Comments

3.1 An inevitable constraint to the MPA process will be the extent and resolution of baseline data available to identify sites with a high degree of certainty. The designation process has to be evidence led and underpinned by sound science. This not only relates to the site specific information, but also the justification as to how an individual site fits into the regional/national context, in terms of its significance, sensitivity and risk.

3.2 Given this very practical constraint, the design principles of the network currently make no reference to the need for flexibility. We would suggest that this is essential, to allow an adaptive approach to site and feature selection and management drawing on developments in knowledge and understanding over time.

3.3 We note that the governance approach being proposed to deliver the strategy represents a combination of national top-down and national bottom-up processes, which we welcome. As a sector with interests in Welsh waters, we also welcome an opportunity to participate in the stakeholder process. While the initial objectives defined by the strategy include using MCZ designations to identify more highly protected sights within existing areas of protection rather than identifying new sites outright, we would nevertheless suggest that the timescales in place to deliver the recommended solutions remain challenging. It is important that the site selection and agreement process is undertaken correctly, and in the event that the timescales become compressed we would further suggest that it would be better to take a little longer and complete the task properly rather than rushing through with a potentially compromised solution.

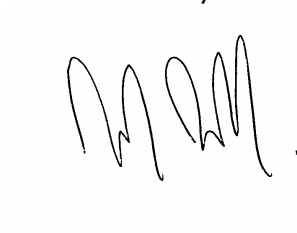
3.4 While we understand the proposed site selection process is intended to involve a wide range of stakeholders through the national stakeholder group, it is important to also recognise that the time and resources available to many stakeholder interests will be constrained – particularly where stakeholders have interests across multiple regions at a UK scale, such as the marine aggregate sector. While the various national and regional project teams may have significant additional resources to deliver to the project deadlines defined, local and national stakeholders are unlikely to be in the same position to provide data and to contribute to the various processes.

3.5 The experience of the marine aggregate sector in engaging with the nearshore English SAC process over the last 6 months has flagged up some useful lessons in the practicalities of site identification and feature boundary definition. Although the sites in question were already defined, a significant amount of time has been spent by the marine aggregate sector re-examining the evidence used to develop the initial Site Assessment Dossiers, and contributing and considering new sources of data and evidence to refine feature extents and boundary limits so they are based on the most robust and up to date scientific evidence. In this respect, industry stakeholders can make a positive and constructive contribution to the wider process.

3.6 In terms of surveillance and monitoring of MPA sites, we would strongly encourage sufficient and realistic resources be allocated to allow this to occur in a meaningful and effective way. The concept of adaptive management, outlined under point 3.2 above, relies upon appropriate scales and resolution of data to monitor changes in the extent and integrity of site features over time. Without this, it will be impossible to determine whether the site objectives are being met. Reference should be made to the intensity and robustness of monitoring effort required to demonstrate compliance with conditions attached to consents for development activities.

3.7 We trust that you find these comments of interest. If you require any further information on any of the points raised above please do not hesitate to contact the undersigned.

Yours faithfully

A handwritten signature in black ink, appearing to read 'M Russell', is contained within a rectangular box. The signature is fluid and cursive.

Mark Russell  
Director BMAPA