



essential materials
sustainable solutions

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Dear Sir

Re. UK Marine Policy Statement: A draft for consultation

1. The British Marine Aggregate Producers Association (BMAPA) is the representative trade organisation for the British marine aggregate sector and a constituent body of the wider Mineral Products Association. The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, ready-mixed concrete, lime, mortar and silica sand industries. With a growing membership of 272 companies, it is the largest UK trade association in the sector and represents the majority of independent companies, as well as the 9 major international and global companies. The MPA represents 100% of GB cement production, 90% of aggregates production and 95% of asphalt and ready-mixed concrete production. Each year the industry supplies £5 billion of materials to the £110 billion construction and other sectors. Industry production represents the largest materials flow in the UK economy. BMAPA represents 11 member companies of the MPA who collectively produce around 90% of the 20 million tonnes of marine sand and gravel dredged from licensed areas in the waters around England and Wales each year.

Background

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, 90% of fine aggregate demand in South Wales, 35% of total construction aggregate demand in South East England and over 50% of construction aggregate demand in London. In this respect, marine aggregate supplies play a key role in supporting the delivery of various Government policies, including Sustainable Communities, the regeneration of Thames Gateway and the 2012 Olympic Games. Some 30% of total production from English waters is exported (to Wales and the near Continent), making a contribution to the nations balance of payments.

3. 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.

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

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4. In the near future, marine sand and gravel resources can be expected to play a key role in supporting the successful delivery of major infrastructure projects associated with Government policies related to energy security and climate change, such as nuclear new builds, tidal power developments, port developments and offshore wind farms. The coastal location of many of these developments means that the sector is ideally placed to supply the large volumes of construction aggregate and fill material that will be required.

5. To meet these various needs, 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.

6. At present 1286km² of seabed is licensed for marine aggregate extraction in the waters around England and Wales, of which around 124km² is dredged in a typical year. This represents around 0.15% and 0.016% of the total UK continental shelf area (867,000km²) respectively. A further 1931 km² 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.

Overarching Comments

7. We very much welcome the opportunity to comment on the UK Marine Policy Statement: A draft for consultation. An efficient and proportionate planning regime which provides a framework to enable delivery of a 'licence to operate' for all activities and operations is essential to support the wider sustainable development and management of UK waters. However, both the planning and regulatory processes need to be guided by a robust and clear long term policy that clearly sets out UK Government's expectations and requirements for all uses of the marine environment.

8. A long term policy view to underpin the planning and regulatory functions is absolutely essential to provide certainty and confidence to marine users, particularly where significant long term capital investment is required to undertake the activity in question. As an example of this the current replacement value for the British marine aggregate dredging fleet is >£1 billion. Vessels are expected to have a working life of 25 years and, with the average age of the British fleet being 20 years old, significant investment will be required in the next 5-10 years. The Marine Policy Statement and the new planning and regulatory regimes that will support the delivery of it will provide an essential backdrop to these investment decisions.

9. The pre-consultation document as presented defines a high level policy context for the sustainable use of UK's seas – and we very much welcome the documents recognition of the need to use marine resources in a sustainable way and to promote sustainable economic development alongside the need to protect the marine environment. In this respect, the vision, high level principles and environmental, social and economic objectives are clearly defined. What remains less clear is how these high level principles will be applied on a consistent basis in support of planning or licensing, a point that is further expanded below.

10. While recognising that the MPS is deliberately high-level, given the challenges of ensuring compatibility between marine uses potentially competing for the same space, and also the need for a transparent and robust mechanism to ultimately guide plan/decision making between competing sectoral activities/policy areas, it is essential that the processes and mechanisms that will inform and guide such decisions are clearly defined. At present the MPS provides no clarity on such matters, focussing instead on the sectoral policy objectives at a UK scale. While

understanding the reasons for this, it does result in a disconnect between sectoral policy and integrated delivery. For this reason it is important that the supporting national marine planning guidance documents provide clarity on the process(es) through which such decisions will be made by the relevant planning and licensing authorities. This will ensure that interpretations and judgements relating to sectoral objectives or decisions on competing requirements across sectors consistently align with national policy, and assist with the transparency of decision making – whether for planning or licensing.

11. Similarly, while section 2.2 defines an over-riding principle for marine planning will be to promote compatibility and reduce conflict, further expanded upon in section 2.3, it is important that all parties (planners, regulators, users and wider stakeholders) clearly understand up front the potential and opportunity for compatibility and co-existence.

12. The explicit recognition under section 2.5 (Economic and social considerations) that activities in the marine area ‘...provide significant social and economic benefits and can drive economic growth, provide opportunities for investment and generate export and tax revenues’ is welcomed, given the Government’s acknowledgement of the importance of international trade in the current economic climate.

13. We welcome the documents recognition that the policy positions it presents and the marine planning process it will ultimately inform will need to sit alongside and integrate with existing terrestrial policies and plans, both national and local. This is particularly important for the marine aggregate sectors linkage with national minerals policy (Mineral Policy Statement 1 in England and Minerals Technical Advice Note in Wales). Marine aggregate supplies form an integral component of the overall portfolio of supply of construction aggregates to both England and Wales, and it is therefore essential that these key policy links are able to be made to ensure a coherent approach to UK minerals supply. This point particularly links to the marine aggregates ‘Issues for consideration’ presented under section 3.5, and ultimately to the development of regional plan objectives as part of the planning process for each region. Again, the emphasis here will need to be on the need for a consistent approach to be adopted across the regional plan areas.

Chapter 3

14. In terms of the marine aggregate context presented under section 3.5 of Chapter 3, we are pleased that the important role the sector plays in supporting the UK construction sector (itself responsible for around 6% of UK Gross Domestic Product) is recognised, as well as the other major end-uses for marine aggregate materials. The acknowledgement of the future potential of the sector in supporting wider Government policy areas, most notably those related to energy security and climate change adaptation, is particularly welcome given the long term nature of the business – both in terms of the time and effort required to secure the necessary mineral reserves, and also the significant investment required to replace the dredging fleet. In this respect, the national policy objectives for marine aggregates in UK waters are clearly stated.

15. The reference to the marine plan authorities taking account of the existing area of seabed that is currently being dredged is welcomed, as is the need to safeguard reserves for future extraction. The latter point is particularly important given that the geological distribution of commercially viable marine aggregate resources is localised to discrete geographic areas.

16. We would though suggest that in terms of planning for the medium to long term, it is essential that the requirements of the sector are not solely based on the existing dredged footprint. While this area represents the spatial pressure exerted by the sectors operations in any single year, permission and licence areas are

generally far more extensive. As an illustration of this 1286km² of area was licensed in 2009, of which 536km² was available to be dredged (the active dredge area) and 124km² was actually dredged. Dredging permissions represent long term interests, and are typically issued for up to 15 years with the potential to be renewed depending on the remaining resource. Equally, the dredging licences issued by The Crown Estate provide operators with the exclusive option to apply to extract mineral resources for up to 30 years and beyond (subject to the successful renewal of permissions). The footprint required by the sector over the term of a permission will therefore be considerably greater than the area dredged in any single year. This is clearly reflected in the 10 year review of the BMAPA and The Crown Estate 'area involved' initiative (November 2009), which reported that the marine aggregate sectors cumulative dredge footprint over the period 1998 to 2007 totalled 463.7km². As a consequence, it is important that the policy and associated planning process recognises the different spatial needs of the sector over time. While we accept that it is not necessarily possible to deliver this in the MPS itself, this is nevertheless something that will need to be developed on a consistent basis through the development of regional plan objectives as part of the planning process for each region. Again, the emphasis here is on the need for a consistent approach to be adopted across the regional plan areas.

17. Finally, we would suggest that the last sentence of section 3.5 '*A permission to dredge should only be issued if the marine plan authority is content that the proposed dredging is environmentally acceptable*' is unnecessary and should be removed. The concept of a consent or permission only being awarded on the grounds of environmental acceptability consistently applies across every marine development sector covered by regulations enacting the requirements of the EIA and Habitat's directives. This concept of environmental protection is also expanded upon in Chapter 2 of the MPS. However, as currently presented the implication is that marine aggregate operations are a special or unique case (no other sectors appear to contain equivalent statements) which we would suggest is misleading.

18. We trust that you find these comments helpful as you continue to develop your thinking on the Marine Policy Statement. Please note that we also have also contributed to and endorse the wider comments from the Seabed User and Developer Group of which we are a member. If there are any queries or further questions relating to the points that we have raised please do not hesitate to contact the undersigned.

Yours faithfully

A handwritten signature in black ink, appearing to read 'M Russell', with a period at the end.

Mark Russell
Director, BMAPA

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