10th November 2014

Dear Sir/Madam

Developing the Welsh National Marine Plan
A Draft Scope, Draft Vision and related Objectives including questions on the Draft Scope for the Sustainability Appraisal, August 2014

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 MPA who collectively produce or supply around 90% of the 16 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, 48% of sand and gravel demand in Wales and over 90% of fine aggregate demand in South Wales. In this respect, marine aggregate supplies play a key role in supporting the delivery of various policies including the Programme for Government and its over-riding priority to generate jobs and growth.
3. Marine aggregates represent an essential part of the ready mix concrete and concrete product supply chain, contributing over 13% of all the concrete aggregates used in Great Britain. The ready-mix concrete and concrete product sectors collectively employ over 30,000 staff, and generate an annual turnover of £4,281 million and a GVA of £1,685 million (Highley et al, 2007). Consequently, a significant part of these sectors, and their associated employment, infrastructure and turnover are entirely dependant upon the continued supply of marine aggregate materials.

4. Marine dredged sand and gravel also provide a strategic role in supplying large scale coast defence and beach replenishment projects – over 38 million tonnes being used for this purpose since 1990. 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, and many ongoing coast defence projects are entirely dependant on the continuing availability of marine aggregate supplies – with there being no practical alternative for large scale beach nourishment.

5. Marine sand and gravel resources are expected to play a key role in supporting the successful delivery of major infrastructure projects associated with Welsh and UK Government policies related to energy security and climate change, such as nuclear new builds (including those at Hinkley Point and Wylfa), tidal power developments (including lagoons), port and transport infrastructure developments (including improvements to the M4 motorway) 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 in the most cost effective and environmentally sustainable way.

6. In all 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 relative to the markets location.

7. As of the end of 2013, 739km$^2$ of seabed was licensed for marine aggregate extraction, of which around 100km$^2$ is dredged in a typical year (The Crown Estate & BMAPA, 2014). This represents around 0.09% and 0.01% of the total UK continental shelf area (867,000km$^2$) respectively. A further 1931 km$^2$ 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.

Overview

8. The marine aggregate sector welcomes the opportunity to contribute to the marine planning process for Welsh waters being led by Welsh Government. A robust, 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 Welsh waters.

9. A long term view is 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 confidence and certainty provided by the new planning regime will provide an essential backdrop to these investment decisions.
10. Associated with the need for long term certainty and confidence, the 20 year plan period envisaged has the potential to influence marine aggregate development decisions significantly beyond the 2035 horizon currently envisaged. The 15 year term of marine licences typically issued for marine aggregate extraction will mean that every licence within the Welsh marine plan area will potentially need to be renewed during the plan period. As such, marine plans can be expected to play a significant role in shaping and guiding the future structure of the UK marine aggregate sector’s interests in Welsh waters over two development cycles – equivalent to a 30 year horizon. This too will have a significant bearing on the long term investment decisions the industry will be required to make in order to maintain the crucial contribution of essential construction materials over the next two decades and beyond.

11. We recognise that the Welsh marine planning process is in its early formative stages, and welcome the opportunity to contribute to the draft scope, vision and related objectives for this process, together with the draft strategic scoping exercise to ensure that the spatial data and background information relating to the marine aggregate sector, on which the marine planning process will rely, are as up to date and accurate as possible. We very much recognise and welcome the fact that many of the experiences from the equivalent processes taking place in English waters appear to be cascading across. In our view this is essential given the importance of a consistent approach to marine planning at a regional sea scale.

12. We welcome the fact that the marine plan for Wales will be developed in accordance with the UK Marine Policy Statement (2011), which requires an appropriate and consistent approach to marine planning across UK waters. This is essential to those sectors with interests in the Bristol Channel and Irish Sea, given the distribution of natural resources sits across administrative boundaries. It is essential that adjacent national marine plans are both appropriate and consistent. This is particularly important when considering the scale and scope of cumulative effects, which in many cases will be more appropriate to be considered at a regional sea scale rather than at a marine plan scale.

Question 1 – Do you have any comments on the proposed vision for the WNMP?

13. We note and very much welcome the long term nature of the vision, for the reasons set out under paragraphs 9 & 10 of this response. We also welcome the focus on sustainability – though wonder whether this may be interpreted rather differently to sustainable development? In his respect, the omission of any overt reference to ‘development’ in the draft vision seems a little strange, given the Programme for Government’s overriding priority to generate jobs and growth.

14. The focus of the draft vision on the Welsh marine area is understood, in terms of the desire to reduce complexity and provide clarity is welcomed, as is the intention for the marine planning system to inform decision making and secure the long term sustainability of the Welsh marine area. However, given that this area will be inevitably closely linked to other marine areas at a regional sea scale (particularly in the Bristol Channel and Irish Sea) it would be sensible to acknowledge this in the vision – not least of which because activities and actions in the Welsh marine area can influence adjacent interests and vice versa. We would suggest that a commitment to consistent and effective management at a regional seas scale could be a useful addition to the final vision.

15. We note reference in the vision to the need to ensure sound management of marine natural resources, and the linkage to the wider national commitment towards natural resource management. However, what remains less clear is how this principle links between the marine natural resources themselves and the marine activities that rely upon these to realise the value and benefit to the Welsh economy and Welsh society. Marine aggregates are one example of this, a marine
natural resource that is only able to realise its contribution to the national economy if the resources are able to be developed sustainably. At present the linkages between the wider concept of natural resource management and the individual sectors are not so clear, and perhaps need to be explored and drawn out further in the supporting strategic scoping exercise.

**Question 2 - By successfully implementing our vision, what will the Welsh Marine Planning Region look like in practice in 20 years time?**

16. It is important that the aspirations around the delivery of the Welsh marine plan are realistic, given the sea change nature of approach that is being proposed. Given the inevitable constraints on resources that are likely to be encountered, it is unlikely that the vision will have been delivered in its entirety. However, this progress has to be judged against the considerable time that it has taken the terrestrial planning system to develop and evolve.

17. In this respect, it is reasonable to expect some clear evidence of progress against the vision and the associated objectives that have been defined by the end of the first plan period. From a marine developers perspective, this would include evidence that the Welsh National Marine Plan has begun to deliver greater clarity and reduced complexity, and has enabled appropriate sustainable development to take place – both maintenance of existing activities and the development of new activities - which have supported jobs and economic growth across the nation, while also ensuring the improvements in the quality of the wider marine environment across the marine plan area. Associated with this would be evidence of a consistent approach to marine management at a regional seas scale.

**Question 3 - Have we included all the headings/sections needed in your view? Please provide us with the details of any addition you would like to suggest.**

18. The High Level Marine Objectives and outline for the Welsh National Marine Plan would appear to be broadly consistent with the UK Marine Policy Statement, which is welcomed. However, we would reiterate the points made under paragraph 15 of this response, which suggests that there needs to be more explanation as to how the principles of natural resource management link to individual activities and uses, given the Programme for Government’s over-riding priority to generate jobs and growth. Similarly, the distinction (or not) between ‘sustainability/sustainable way’ and ‘sustainable development’ could also usefully be made more clearly.

**Question 4 - Do you agree with the key issues identified in the SSE that will inform the scope of the SA?**

19. We have made a number of comments on the SSE document, which are presented in the annex attached to this response.

**Question 5 - Have we included all relevant plans and programmes in our review? Please provide us with details of any omissions.**

20. The only omission that we can see is the joint guidance published by BMAPA and English Heritage (2003) ‘Marine aggregate dredging and the historic environment – Assessing, evaluating, mitigating and monitoring the archaeological effects of marine aggregate dredging’, the ‘Protocol for reporting finds of archaeological interest’ that followed in 2005 and the supporting ‘Annex to the Protocol Guidance on the use of the protocol for reporting finds of archaeological interest in relation to aircraft crash sites at sea’ published in 2008. Although focussed on an English setting, the principles that are established in all of these documents are equally relevant to archaeological finds recovered in Welsh waters. All the documents can be downloaded here: [http://www.wessexarch.co.uk/projects/marine/bmapa/docs.html](http://www.wessexarch.co.uk/projects/marine/bmapa/docs.html)
21. We trust that you find these comments of use. If you require us to clarify any of the issues that are raised or elaborate upon any of the practical points that we refer, please do not hesitate to contact the undersigned.

Yours faithfully

[Signature]

Mark Russell
Director, Marine Aggregates

References


Welsh National Marine Plan – Draft Strategic Scoping Exercise, 12.08.14

Additional comments provided by the British Marine Aggregate Producers Association, 10th November 2014

Summary

Consistent approach to marine planning at a UK scale

We welcome the fact that the marine plan for Wales will be developed in accordance with the UK Marine Policy Statement (2011) (MPS), which requires an appropriate and consistent approach to marine planning across UK waters. This is essential to those sectors with interests in the Bristol Channel and Irish Sea, given the distribution of natural resources sits across administrative boundaries. It is essential that adjacent national marine plans are both appropriate and consistent. This is particularly important when considering the scale and scope of cumulative effects, which in many cases will be more appropriate to be considered at a regional sea scale rather than at a marine plan scale.

Co-location

We see that reference is made throughout the draft SSE to ‘co-location’, and would note that this term is not used in the MPS which instead favours ‘compatibility’ and ‘co-existence’. We would suggest that these are more appropriate to the range of issues that marine users face. From a marine aggregate perspective, the majority of interactions arise from activities taking place adjacent to one another – and these interactions are arguably as important as those activities which seek to use the same space.

Economic growth

In terms of economic growth, it is essential that the evidence supporting the marine planning process makes the correct links between the activities taking place and their wider value in supporting activities contributing to economic growth in Wales. In the case of aggregates, with 90% of natural fine sand used for building and concrete purposes in South Wales coming from marine sources, the role of the marine aggregate sector in supporting the construction activity across the region and the wider economic benefits associated with this are enormous – both in terms of maintaining existing infrastructure, as well as supporting the development and regeneration of infrastructure and assets.

Coastal change and flooding

Given the potential threats to key environmental and infrastructure assets, together with the risks to coastal communities arising from the changes resulting from climate change, we are surprised that little reference is made to the future requirement for local marine sources of beach replenishment material in order to protect vulnerable features over the plan period and beyond. For soft defence solutions, there are very few alternative options that are available other than marine sand and gravel – particularly given the likely volumes of material that may be required.

Aggregates

The value through the supply chain marine aggregates enabled by supporting construction and regeneration activity taking place, needs to be recognised and acknowledged in more detail. BMAPA, MPA Wales and The Crown Estate have commissioned the Welsh Economic Research Unit to undertake a review of the regional economic contribution of the mineral products industry to Wales, which should be published towards the end of Q1 2014.
We note that the text currently references marine being the only significant source for sand to be used in concrete – the same applies to sand being used for general construction and building purposes.

In terms of the ‘further considerations/issues’ to be considered by marine plans, we are concerned that this appears to be approached in an inconsistent manner across the sectoral interests. In the case of marine aggregates, a detailed list of environmental issues that have to be considered by the licensing process is provided – however this is not necessarily reflected in the narrative presented for other activities and uses. The SSE has to be careful that it does not unintentionally create the impression that some sectors have more significant issues than others – the issues have to be presented consistently. We would also note that the issues being cited would have to be assessed through the licensing process anyhow before extraction could be permitted, in accordance with the sectoral policy requirements that are in place.

**Introduction**

p.34 – We note that the Programme for Government reinforces the importance of sustainable development as the central organising principle in defining the best development path for Wales and that the principles of sustainable development are embedded in the legal definitions of natural resource management to be established under the Environment Bill.

We also note that the SSE has been undertaken to assess the spatial distribution of natural resources and human activities within Wales’s marine area and to understand at a strategic level the key issues that marine planning should take account of – including identifying trends.

p.38 – Given the spatial distribution of commercially viable marine aggregate resources is focussed into discrete areas which reflect the geological processes that have created and formed them, we very much welcome the work undertaken by The Crown Estate in helping to understand the technical opportunities that may be available in Welsh waters for natural resources – particularly those that may be considered to be finite. In this respect, we would strongly endorse the resource mapping undertaken by the British Geological Survey and the safeguarding principles they have developed.

**General Considerations**

p.51-53 Cumulative effects (3.1) – Alongside plan scale consideration of potential cumulative effects, there will need to be regional sea scale consideration too.

Co-location and displacement of activities (3.2) – We note on p.58 that reference is made to the potential loss of ground for trawl fisheries due to aggregate extraction (Cooper, 2005). We would comment that these findings were as a consequence of a series of interviews with local fisheries interests and therefore represent qualitative examples. More recent research (Vanstaen, 2010 – Assessment of the distribution and intensity of fishing activities in the vicinity of aggregate extraction sites, MEPF/08/P73) looked at evidence of changes in fishing effort related to marine aggregate activity, through a quantitative analysis of fishing vessel monitoring (VMS) data. This suggested no significant reduction in mobile fishing effort across licensed areas, with compliance monitoring data for these areas showing clear evidence of trawl and scallop dredge scars across actively worked extraction areas.

Climate Change, Key issues for marine planning (3.6.2) – again, no reference to the potential for soft defence as part of adaptation, and the marine aggregate resource requirements that would be needed to support this.
Coastal change and flooding, Key issues for marine planning (3.7.2) – again no reference to the potential for soft defence as part of adaptation, and the marine aggregate resource requirements that would be needed to support this. This point is reinforced by the fact that under 3.7.4 (Current status) reference is made to ‘significant investment in the construction of new coastal defences across Wales’, including sites where marine aggregates have been used to replenish local beaches.

Natural Resources

(4.3.5) The future, Geodiversity, para.1 (p.158) – The wording of the last sentence infers that marine developments result in local scale changes in sediment supply to local beaches. We would suggest that this is misleading, as if there was any link between a development activity and the status of a local beach then the activity is unlikely to be licensed. The only way that the local sediment supply could be changed would be through deliberate actions to do so – such as through the supply of sand from offshore resources to replenish the beach.

(4.5.6) The future (p.187) – Again, only hard sea defences are referenced, in terms of their implications to the seascape. Soft defences, such as major beach replenishment works, would similarly result in changes to the seascape, by increasing the width and nature of the beach frontage.

(4.7.4) Current status – We would suggest that the work of Robinson et al, 2011 (Measurement of noise arising from marine aggregate dredging operations, MEPF 09/P108. ISBN 978 0907545 57 6) should be cited.

Section 5.1 – Aggregates

5.1.1 – In terms of the value of the sector, the current costs do not represent the contribution and support of construction aggregates to the wider construction sector supply chain. As an example, at a UK scale total construction mineral extraction is worth £2.4 billion, total construction products are worth £5.3 billion and downstream markets are worth £400 billion. There is a similar relationship with employment – with extraction representing 6-7,000 jobs and construction products 19,000-23,000 jobs (reference The foundation for a strong economy – Initial assessment of the contribution of the mineral products industry to the UK economy, Capital Economics, 2012). While these relationships are UK scaled, there is likely to be a similar relationship at a Welsh scale. BMAPA, MPA Wales and The Crown Estate have commissioned the Welsh Economic Research Unit at Cardiff University to undertake some specific research to refine the contribution of the mineral products industry to the Welsh economy.


Figure 24 – The chart presenting the location of aggregate interests around the Welsh coast would appear to be out of date, with a number of licence areas that are currently presented no longer being licensed. This needs to be updated.

5.1.2 – Key issues for consideration. As well as the direct and ancillary employment, the role that marine aggregates play in supporting regional construction works also needs to be acknowledged – particularly in South Wales, which is so heavily dependent upon marine sources for concrete and building aggregates.

There also needs to be some commentary around why marine aggregates represent the most sustainable source of supply. Construction aggregates are a low value, bulk material and are therefore sensitive to the costs of transportation – for
example a 20 tonne lorry-load will only be able to be transported 30km. Through the economies of scale that are possible, marine aggregates are able to be transported in large volumes (over 2,000 tonnes) over considerable distances, and delivered into the heart of coastal urban areas where they need to be used. This is both cost effective and energy efficient.

We would agree with recognition that marine aggregate resources need to be safeguarded against pressures, both now and also into the future. Examples of incompatible activities would include cables and pipelines, energy developments and designated anchorages.

We are also surprised that little reference is made to Wales being a net importer of marine aggregates at present (particularly in the Bristol Channel) – with the majority of supply being met from licence areas in English waters. This reinforces the importance of the consistency in marine planning at a regional sea scale.

5.1.4 Current status – We note the reference to marine sand being of limited importance in North Wales. While this may be correct for the local economy, the significance and value of this source of supply to the construction activity taking place in the major urban conurbations of Liverpool and Manchester must be acknowledged – as marine aggregate supplies represent the most sustainable source of supply to these areas.

The statement in the first paragraph of this section is somewhat misleading, as it implies that suitable land-based resources are available to contribute to the supply of market demands in South Wales. While there are sand and gravel deposits present in the region, the majority of these are seriously constrained. This may be through quality (including overburden), location or environmental/development constraints. Local demand is for sand (not gravel) as the coarse aggregate demand is met from crushed rock sources – consequently, the gravel (and fine sand) is considered a waste product and the processing required to produce the quality of sand required makes the resources un-economic.

The information on marine aggregate interests presented in para.2 of this section/figure 25 is out of date and needs to be updated – many of the licence interests cited have been relinquished by the industry. Similarly, data exists for 2013 production/landing figures.

5.1.5 – The future, para.1 (p.206) – The wording of the last part of this paragraph is a little strange, stating that ‘...it seems reasonable to suppose that...’ marine aggregates will continue to supply. Given that ordinarily, land-based extraction is normally more cost effective this would be the default position if suitable resources existed to support the local market demand. The fact that this does not currently happen would suggest that the assumption must be that marine aggregates will continue to supply. The location of the land-based resources proximate to the principle markets coupled with their constraints, are not likely to fundamentally alter.

Para.2 – the first sentence seems to be out of place given the remainder of the information presented in this paragraph. We would suggest that it be presented as a separate paragraph 3. At the end of this para (p.207), reference is made to no marine aggregates being exported from Welsh ports – while this is correct, marine aggregate dredged from licences in Welsh waters can be landed in English ports (Avonmouth, Bridgewater), and vice versa marine aggregate dredged from English licences is landed in Welsh ports. In fact, South Wales is currently a net importer of marine aggregates from English licences and this point should be highlighted.