J1a Additional concerns raised by the British Marine Aggregate Producers Association and The Crown Estate about the impacts of rMCZs on aggregate extraction

J1a.1 This section presents concerns about impacts of MCZs raised by the British Marine Aggregate Producers Association (BMAPA) and the Crown Estate that are not raised elsewhere in material for the IA (for example, as part of the approach for assessing impacts, or as part of the assessment of site-specific impacts in Annex I).

Impacts upon the future aggregate extraction and aggregate supplies

J1a.2 Should any of the current judgements relating to the acceptability of marine aggregate operations taking place adjacent to potential MCZ sites alter for whatever reason, there is the potential for very significant costs to be incurred by operators (BMAPA, pers. comm., 2011).

J1a.3 During the 20 year period of the IA, many of the existing marine aggregate production licence areas are likely to become exhausted. The UK Marine Policy Statement (2011) recognises the need to safeguard reserves for future aggregate extraction. As a consequence of this, existing production licence areas will need to be replaced in order to maintain existing levels of marine aggregate supply. Over the same period, demand for large volumes of marine aggregate is likely to increase; in association with growing needs in the areas of energy (renewables and nuclear), transport (port and airport developments) and climate change adaptation (large scale beach nourishment works) (BMAPA, feedback on draft IA material, 2012).

J1a.4 The need to safeguard future reserves is further expanded upon within the East Inshore and East Offshore Marine Plan Areas Evidence and Emerging Issues report (2011) and has been investigated in research by the British Geological Survey (commissioned by The Crown Estate) which mapped areas of prospective sand and gravel resource across the UK continental shelf. The first phase of this research, which has considered the East inshore/offshore area, and this has identified areas of high potential for a range of sand and gravel deposits a number of which coincide with MCZ proposals (BMAPA, feedback on draft IA material, 2012). BMAPA and The Crown Estate are concerned about the impact that MCZs could have upon the UK supply of marine aggregate during the 20 year period of the IA, but also upon the future supply outside of this period (BMAPA and The Crown Estate, feedback on draft IA material, 2012).

J1a.5 In particular The Crown Estate is very concerned about the impact of rMCZ 8 (Goodwin Sands) and rMCZ 8 Reference Area 6 (Goodwin Knoll) on strategic aggregate resource. This is because as well as offering features of important conservation value, the Goodwin Sands bank system is a dynamic highly mobile system which contains highly significant volumes of aggregate resource of various grading. Within the boundary of rMCZ 8 (Goodwin Sands), there is an important block of potential aggregate resource which includes South Sand Head, the Historic Area 342 aggregate licence (Dover Harbour Board) and the North Head of South Calliper. The block contains a strategic resource, both in volume and location terms, for coastal defence, coastal development and construction to supply a range of markets and projects. Goodwin Sands has been dredging previously primarily for fill aggregate for infrastructure projects at Dover and Ramsgate, with 5 licences being issued covering the North Goodwin and South Goodwin areas

(293/1, 304, 342, 352 and 365) with over 9.5 million tonnes (6.3 million m^3) extracted between 1976 and 1998 (The Crown Estate, feedback on draft IA material, 2011).

J1a.6 The Crown Estate seeks ability for dredging to occur within this potential resource block should it be required in the future, though there is not necessarily a presumption that dredging will occur across the block. The Crown Estate has indicated that closure of the resource block to aggregate extraction would have significant economic impacts on aggregate industry and potential knock on effects on construction, beach recharge and coastal protection operations. To safeguard this strategically important resource for the forthcoming leasing round, The Crown Estate suggests that rMCZ 8 (Goodwin Sands) is designated using a zonal approach that would allow aggregate extraction from the potential resource block for essential mineral resource supply (The Crown Estate, feedback on draft IA material, 2011).

Impacts upon future licence applications

J1a.7 BMAPA anticipates that should a potential linkage be identified between a marine aggregate interest and an rMCZ, it is likely that an additional level of survey effort would be required during the term of any licence permission, even if this was simply to demonstrate 'no adverse effect'. Based on experiences monitoring site specific features, BMAPA estimates that the additional monitoring burdens would result in an additional cost of around £10k per annum across the lifetime of the licence term (£150,000 in total over the term of a 15 year production licence). This cost is for additional survey effort, analysis and reporting. However, it is difficult to be specific about the cost without relating to site-specific circumstances. To set this in context, the average annual cost (based on total cost spread across the licence term) of undertaking compliance monitoring for a marine aggregate production licence range between £50k and £100k per annum. There is also the uncertainty in the costs associated with supporting and informing the assessment of impacts of licence applications on coherence of the MPA network if this is undertaken by JNCC and Natural England (BMAPA, pers. comm. 2012).