

Kelling to Lowestoft Shoreline Management Plan

Consultation on the strategic Environmental Assessment and other documents

Public Consultation Response Sheet

Extensive public consultation was undertaken when the draft SMP2 was published in 2004/2005.

The responses to this consultation have been carefully considered and have helped inform the development of the final SMP2. We are now formally consulting on the Strategic Environmental Assessment (SEA), but would also welcome comments on the Water Framework Directive (WFD) Compliance report and the Habitat Regulations Assessment (HRA) Report. We would welcome any other comments you may have. It would be helpful if you could record your comments on this form, but you are welcome to provide additional information.

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General comments on the SEA:

If you have any general comments on the SEA, then please make them here.

There are no changes in the Preferred Policy Appendix 2.6 for any of the SMP's units from the Kelling to Lowestoft Ness SMP Sub-Cell 3b November 2006 Final report.

In fact this SEA just repeats and elaborates on the management strategies and policies of the SMP Sub-Cell 3b November 2006 Final report.

This SEA report contains much more detail on previous information in the Sub-Cell 3b November 2006 Final report and additional information, but in the Results section Volume 2 Section 12 Conclusion 12.2 Results of SEA – No conclusion is reached and there is no defined recommendation whether to adopt the policies in the Sub-Cell 3b November 2006 Final report and this SEA or not?

In fact you issue contradicting results:

From this section: *“The SEA has identified that if the policy options were to be taken forward as they stand there will be significant adverse effects on the built landscape and town scape, coastal activities and industries and physical and mental wellbeing, which has been attributed to the loss of housing, infrastructure and associated industries.”*

But also in this section of the report: *“The SEA has also identified beneficial impacts on the coast processes as the reduction in the amount of defences along this stretch of coastline will allow for a more naturally functioning coastline to develop.”*

*This statement is not true because areas that have a policy of “No Active Intervention” (NAI) will have increased erosion because of the hard defences of adjacent units and consequently the unit policies in this SEA will **not** allow a more natural functioning coast line to develop along the total section of coastline covered by this SMP.

In fact you also point this out in your report *“So in other words the hard defences, Hold the Line policies and artificial reefs will have a negative effect on units further southward.”*

* See also my comments in: Your Area Specific SEA Comments – which supports this statement

So which option is this SEA recommending?

1. The policy units as they stand should be adopted and accept that an unnatural coastline will develop as a result with significantly accelerated erosion in areas with a policy of NAI.

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2. All areas of this section of coastline should have a policy of “No Active Intervention” (NAI) to allow a natural coastline to develop.
3. All unprotected areas should have hard defences erected to protect properties, infrastructure, industries and tourist locations.

As we already have a significant number of units with hard defences and policies of “Hold the Line” I suggest that it is option 3.

I would also like to bring to your attention a fact that all the government and commercial Environmental Impact Assessments conveniently choose to ignore:

This is that what ever policy is adopted for sea defences in the future (i.e. the next 100 years covered by SMP 3b) the erosion of this coastline will also no longer be natural because of the accelerated erosion caused to the Norfolk and Suffolk beaches and dunes by the intense offshore aggregate dredging off this coastline.

Why dose your SEA report on SMP 3b not mention this activity which is causing increased risks to our natural shoreline and installed hard sea defences by eroding beaches which undermine sea walls ??

It is a known fact that prior to 1980 when the tonnages of aggregate removed from the offshore seabed areas adjacent to the Norfolk and Suffolk coastline significantly increased *(see statement of fact below) the beaches at Gorleston and Hemsby did not have to be recharged annually by residue sand from the these dredging operations to replenish them and protect the undermining of the sea defences behind them – which in any case is ineffectual see MARINET web-site www.marinet.org.uk.

*** When offshore dredging commenced along the East Anglian coast in 1973 just 3 million metric tonnes were removed per annum, by 1992 this had risen to an annual extraction rate of 18 million tonnes, in 1994 22 million tonnes were removed and aggregate extraction rates continued increasing annually.**

See attached document (one of many on MARINET web-site) www.marinet.org.uk Titled “Evidence for the Anglian Offshore Dredging Association Confirming the Link between Offshore Dredging and Erosion of the Adjacent Coastline”.

Area Specific SEA comments

Please indicate the specific area your comments on the SEA relate to: Village/parish/town?

SMP 3b Unit 6.14 (in your SEA) and Unit 3b.14 in the Kelling to Lowestoft Ness SMP Sub-Cell 3b November 2006 Final report: Winterton–on–Sea to Scratby.

All of the units each side of this area have policies of “Hold the Line” and hard sea defences i.e.:

Unit 6.13 Eccles to Winterton – Protected by a sea wall and with a policy of “Hold the Line”.

Then we have Unit 6.14 Winterton to Scratby with its policy of “No Active Intervention” (NAI) – no sea defences and no intervention (protection measures) allowed.

Next we have Unit 6.15 California which is protected by a Rock Berm hard defences and a policy of “Hold the Line”.

Then Unit 6.16 California to Caister protected by a rock groyne and rock berm Berm hard defences and a policy of “Hold the Line”.

Then there is Unit 6.17 Caister to Great Yarmouth protected by a sea wall hard defences and a policy of “Hold the Line”.

So why is Unit 6.14 Winterton to Scratby singled out to have no protection?

Because this unit has no protection, since the tonnages of sea-bed aggregate removed along the Norfolk coastline significantly increased after 1980 this unit has suffered accelerated erosion.

The sand is being stripped from the beaches every year and sucked into the sea all along this unit’s total area and the following are some examples of other significant losses after 1980:

The quadruple sand dune banks which existed along the Winterton valley and the dual sand dune banks along the Newport - Hemsby valley now have only half to one third of their last dune bank remaining;

may holiday units in these dunes were swept into the sea during this period of accelerated erosion of the dunes.

The Hemsby inshore life boat launch ramp was undercut by erosion and had to be rebuilt further back twice.

The Winterton sand dune cliff at the beach access has been eroded to within a metre of the beach café. The sand/marram grass cliffs from Newport to Scratby have had at least 4 metres stripped from them.

This is contrary to your general policy statement in this SEA:

“The SEA has also identified beneficial impacts on the coast processes as the reduction in the amount of defences along this stretch of coastline will allow for a more naturally functioning coastline to develop.”

The above facts prove that it is not a natural process at all!!

Also If the policy of “No Active Intervention” (NAI) for unit 6.14 is maintained in the long term because of the hard defences each side of this unit its accelerated erosion will undermine the rock berm coastal protection of California Cliffs - the next unit (to the South) of it, Unit 6.15 California – due to the venturi effect of the predominant North – South tides, because of the narrowing restriction they encounter at the start of the rock berm in this location due to the (unprotected) widened eroded area next to it in unit 6.14.

Any other comments (e.g. on the SMP Action Plan, WFD or HRA reports):

FINALLY:

It takes considerable unpaid effort to regularly compile this information for the many government EIA's and reports on this subject and we (the local public) get the strong impression that this is just appeasement - i.e. these reports always go out for extensive public consultation but no notice is taken of our comments (even though some times they are recorded in your final reports) and you the Consultants contracted by the government always in your final reports recommend the preferred government policy any way.

A good example of this appeasement was The Kelling to Lowestoft Ness Shoreline Management Plan (First Review) Public Consultation in 2005 - when this report was issued by the Anglian Coastal Authorities Group (ACAG) there were more than 2,400 responses to it's public consultation, only 10 of these, respondents found this plan acceptable .

In addition to all the objections from local Authorities. Local Groups and individuals; there were many public meetings with strong objection to SMP 3b which had changed the policy of "Hold the Line" in many previous local authorities coastal protection plans (i.e. unit 3b 14 Winterton to Scratby) to "No Active Intervention" in the SMP 3b.

Despite the 2,390 overwhelming local objections to SMP3b it was adopted by the government (DEFRA & the EA) as their top level coastal protection procedure document with polices to nothing (in many areas) for the next 100 years.

As an ex HSQE Consultant I despair at the current situation of the profession in its effort to find facts only for the contracted side of the situation.

Do you wish to be kept informed about further development of the SMP strategies and action plans in the future? Answer: Yes.

Please return the completed form and any associated information by July 2nd 2010 to:
Coastal Management Unit, Council Offices, Holt Road, Cromer, Norfolk, NR27 9EN.
Or e-mail a copy to coastalmanagement@north-norfolk.gov.uk Thank you.

This Response is submitted by: M J King – Sctaby Coastal Home Owner and Representing MARINET Great Yarmouth on 28 June 2010

For office use only: Response No.