

Dear Councillors,

It was most unfortunate that no comment or opinion was permitted from the floor at the Great Yarmouth Town Hall meeting on the adoption of the Shoreline Management Plan (Revision SMP2) on Wednesday 22nd August, and that no second opinion on the content of the briefing to the Cabinet was sought prior to its provision.

It is hard to believe that the Cabinet could even contemplate agreeing to the government's Shoreline Management Plan when all but three of the 2,390 coastal residents consulted vehemently rejected the first wording on meaningful grounds. The new SMP2 is structurally the same presentation.

A large number of inaccuracies and biased hypothetical assumptions were conveyed in the paper 'Update for Cabinet' as part of the agenda for SMP2 (the revised Shoreline Management Plan) that was recommended to Cabinet for adoption. Many of these statements need correction and the addition of further important facts that the Cabinet should have been made aware, so I would like to propose of the following points need to be considered by Council before compliant acceptance of SMP2.

The background to the current situation is that as of next year the Environment Agency is to be handed a broader role in the management of all flood and erosion risk on the English coast. Up to now the responsibility for coastal upkeep has rested with local councils or the Environment Agency, depending on the location, thus accessible to local knowledge and expertise. This local council role is soon set to disappear as on 22nd June 2007 DEFRA issued a Press Release stating:

*"The Environment Agency is to oversee management of all flood and erosion risk on the English coast ... with its new strategic overview role, the Environment Agency will:*

- *take the lead in managing all sea flooding risk in England, and fund and oversee coastal erosion works undertaken by local authorities*
- *ensure that proper and sustainable long-term Shoreline Management Plans are in place for the English coastline*
- *work with local authorities to ensure that the resulting flood and coastal erosion works are properly planned, prioritised, procured, delivered and maintained to get maximum value for taxpayers' money*
- *ensure that third party defences are sustainable"*

DEFRA, who have long demonstrated a very poor understanding on all flooding matters ( not just coastal ) have created a situation where Maritime Authorities must either accept the SMP as it stands or be considered and classified as 'outside the system'. If that happens there will be no cooperation forthcoming from DEFRA, and most probably no funding. This clearly has very serious future implications for the maritime coastal authorities and their peoples. The attitude of DEFRA ad the Environment Agency is tantamount to blackmail, or, as diplomatically stated at the meeting by Cllr. Shrimpling *"We are caught between DEFRA and the deep blue sea"*

It first needs to be pointed out that acceptance of SMP2 by Great Yarmouth Borough Council (GYBC) is in no way linked to obtaining Central Government (DEFRA/EA) funds for coast defence. The fact is that GYBC have been told by DEFRA that if SMP2 is not accepted in its current form by them they will be classified as **outside the system** and will not be allowed to even bid for funds. To understand this is to understand that there will not be any right to funds regardless of the consequences. It merely means that the coastal authorities, if they accept SMP2, will retain the right to bid for funding, but are in no

way guaranteed the provision of any funding whatsoever. The councillors need to realise that their present ability to discuss the SMP in any meaningful sense toward a satisfactory conclusion in their Council Chamber will shortly be lost once the EA and DEFRA take over sea defences.

To criticise the document 'Shoreline Management Plan - Update for Cabinet' produced for the Cabinet meeting of 22nd August, it is necessary to point out part of the misinformation present in the document.

First, the statement that the loss of the beach(es) will come about in 100 years. This is a myopic and over-optimistic assumption. The total loss is far more likely to be within 30 years at the very best. It needs to be remembered that in earlier studies that the SMP is based on were carried out by consultants Halcrow, who, using computer simulation, produced erosion line predictions as the sea approach line covering for the following sixty years, i.e. by 2052. Many of these lines produced were crossed within five years, i.e. by 1997, twelve times that rate of loss to the sea predicted. Awareness of this therefore produces a lack of confidence in the latest projection, which can really only be seen as a conjured presumption. The previous serious inaccuracy was undoubtedly because the Halcrow Report did not allow for the impact of Offshore Aggregate Dredging. When that factor enters the equation, the apparent anomaly becomes fully explainable. The new SMP must consider this major cause of coastal erosion if it is to have any credence, yet it barely has a mention in the SMP.

Although in the very long term the entirety of the East Anglian coastline has been slowly eroding due to natural circumstances, it has not been a linear progression. The entire shoreline from Winterton down to Caister was accreting until two years after commercial scale offshore aggregate dredging commenced. This is evidenced by the inland position of Winterton Lighthouse on the western side of the Great Winterton Valley, which long before our time was the original shoreline. It was not until after marine aggregate dredging commenced that the series of dunes and wide beaches along the entire stretch began to be lost due to undermining brought about by beach sand draw down, this due to offshore demand. This relationship has been correlated graphically (1)

Furthermore, the sediment supply has now all but ceased. The loss of dunes and beach sand plus the failure of sea defences coupled with the huge cliff falls from Sheringham to Happisburgh and beyond would have produced a far greater coastal sediment supply, not a diminishment. Thus, it is not the presence of sea defences that have brought the starvation about, but the offshore demand. DEFRA have failed to address this. Licenses to further dredge have been issued without post-dredging Environmental Impact Assessments, despite the evidence of damage and the recognition of cause and effect by numerous independent coastal geomorphology experts not financially involved with the dredging companies.

The cause given in the document is said to be 'natural'. This is not the case. Only the tectonic lowering of East Anglia of 2mm per annum is 'natural'. Due to Marine thermal expansion plus glacial and polar icecap melt, we are experiencing a current sea rise 5 to 6mm per year, increasing. This is not natural but man made due to governments failure to address global warming. Combining both sea rise and sinkage to give 8mm total rise per year would produce 160mm (16cm) of apparent sea rise over 20 years. This would produce an inland incursion of the sea high tide mark of 320cm, e.g. 3.2 metres or ca.10 feet on the average 1 in 20 slope beach.. The actual rate along much of our north to east coast has been more than twenty times this, and the average mean is more than ten. It is not that the sea has risen nor that the land has sunk that much, but that the beaches have been stripped of their sand cover by many metres, so allowing the sea and its eroding waves so much closer to the coastline.

Further, due to the exploitation of offshore sand and gravel deposits, the offshore sea bed has been lowered by between 3 and 5 metres in the dredged areas, this allowing greater eroding waves and gravitational draw down of our beaches. It is this cause which needs to be addressed. But even if offshore dredging ceased today, our beaches would continue to be lost as the seabed readjusts taking beach seizure for replacement. As it is, dredging continues with new licences having been issued despite the evidence of the damage already sustained. Thus sea defences are in vogue until long after the main cause is terminated.

To comment on two other incorrect sections of the briefing:

Page 21 6. The latest scientific knowledge has **not** been employed. Alternative far more effective sea defences of far lower cost have not been considered. (2)

Page 21 11. The effects will not soon commence. They are already being seen, and have been for over twenty years. (1)

Whilst comment on the SMP and its implications for our coastline and inland low laying areas fall within my remit, the problems visited by the failure to defend fall upon the Council. Truly DEFRA have placed a gun to your heads.

The moral, ethical, social and economic problems that will arise on the adoption of the SMP are many, and need to be addressed by the Council. Householders without defences will lose their properties and demand compensation and/or rehousing, business concerns will lose their livelihood, heritage 1930's bungalows will be destroyed, car parks inundated, lifeboat housing and shops lost, nature sites destroyed and the considerable income derived from the vital tourist trade will disappear when the beaches and other amenities have disappeared. Coastal roads and the associate infrastructure such as water, gas, electricity and sewage will go. Further, entry of the sea will bring about the salination of public water supplies and agricultural abstraction sources, also bringing about the loss of the broadland habitat, so having a serious impact upon inland areas.

In your decision you may wish to contemplate placing a clause that DEFRA must attend to the problem that they have allowed by not intervening on the industrial exploitation that has created the problem, viz. government approval for huge scale dredging off the Great Yarmouth (and other) coastlines. The government have taken well over one billion pounds in the form of royalties to The Crown Estate and by VAT levied upon the sale of dredged aggregate, whilst the dredging company shareholders will undoubtedly have taken even more.

If only a small fraction of this were returned in the form of funding for the provision of effective sea defences as in all other European coastal countries, and if commercial offshore aggregate dredging was attenuated (also as in all other European countries) there would be no problem.

MARINET has long consulted on the SMP (3) and had numerous consultations over the issue of coastal erosion, dredging, flooding. etc. with the Environment Agency, DEFRA and the dredging organisations. I would be more than willing to discuss the matter(s) with the Council or offer further advice if needed.

Although I feel that amendments to the SMP based on the above points are vital, it is probable that DEFRA will insist on acceptance of the plan in its present form, unmodified. Nevertheless, such clauses are needed to make it acceptable to your electorate. I do not envy you the decision you have to make.

With regards and best wishes,

Pat Gowen

MARINET & NSAG.

References:

- (1) <http://www.marinet.org.uk/mad/madbrief.html>
- (2) <http://www.marinet.org.uk/coastaldefences/canute.html>
- (3) <http://www.marinet.org.uk/coastaldefences/patmsfw.pdf>