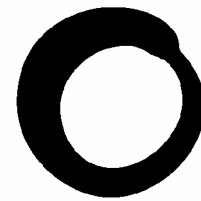




Marine Information Network
www.marinet.org.uk

Mike King
79 California Avenue,
Scratby, Great Yarmouth,
Norfolk.
m.king.insp.safety@totalise.co.uk



**Friends of
the Earth**

Mrs. Lindsay Jane Seiderer
Marine Ecological Surveys Limited
24a Monmouth Place
Bath
BA1 2AY

Mas La Mer
79 California Avenue
Scratby
Great Yarmouth
Norfolk
NR29 3NS

Your Ref: H202/EX/1

Our Ref: MJK/202/EX/2008/01
20th. October 2008

Consultation Request for Government View Application **Extension of Licence Area 202 (Cross Sands)**

Dear Mrs Seiderer

Thank you for your above referenced letter dated 10 September 2008 with enclosed scoping information package and questionnaire for the proposed extension of offshore dredging operations for Area 202 (Cross Sands) for a further 15 years from 2010.

Marinet are shocked and amazed that Hanson Aggregates Marine Limited (HAMEL) are asking to continue extracting seabed material from this location for a further 15 years because: Area 202 and its adjoining Area 436 are already **over dredged** and (as shown in your enclosed) Background Information for Scoping Package Area 202: Cross Sands Fig 2 Impacts on Bathymetry – a quarter of 436/202 Area has already been dredged to depths of 5 metres and significant portion of this area has been dredged to depths >10 metres.

These deep pits adjacent to Cross Sands Sand Bank are affecting its stability, the profile of this sand bank has already been reported as changing – see the Sand Pit Report Re the mechanisms of draw down of adjacent material into dredged areas.

<http://sandpit.wldelft.nl/reportpage/reportpage.htm>

I am enclosing my returned questionnaire for your study which details this with our other findings and concerns.

Marinet also state that for your study to be meaningful it should include:

The cumulative effects of the offshore dredging in this area.

A scientific beach sand tracer study (as described in page 3 of my questionnaire) to check beach draw down into dredged areas.

An up to date wave regime model, this model must use offshore, contemporaneous meteorological data in order to ensure accuracy of computation.

The wave regime model must take account of changes in the depth of the sea between the offshore sites and the coast and be based on the current spring tides high tide line – right up to the dunes/cliffs.

The wave regime is a key factor in determining the erosive force of the sea upon the coast.

The changes in the nature of offshore sandbanks must be also included in the computations of this study.

Yours sincerely Mike King

For and on behalf of Marient Friends of the Earth Great Yarmouth

CONSULTATION QUESTIONNAIRE

Area 202 Cross sands

APPLICATION FOR CONTINUATION OF DREDGING LICENCE

By

Hanson Aggregates Marine Limited
2008

MES
Marine Ecological
Surveys Ltd.

Organisation: MARINET – Marine Information Network, Friends of the Earth

Contact Name: Mr. M King

Who in your organisation is ultimately responsible for comment in matters of consultation?

Stephen Eades is Marinet Coordinator – Stephen is based in Wiltshire.

Mike King represents Marinet in his local Great Yarmouth area and has authority to liaise with and prepare documents for: local authorities, offshore dredging companies, other organisations and the press on consultation matters for and on behalf of Marinet.

What are the interests of your organisation in the marine area off the east Anglian coast?

(1) The accelerated loss of beach sand (beach draw down) and coastal erosion along the Norfolk and Suffolk coastlines.

We believe the intense offshore aggregate extraction from the massive dredging site stretching from Caister-on-Sea in North Norfolk to Corton in North Suffolk, between three and thirteen miles offshore has caused this – see Marinet website for evidence www.marinet.org.uk.

If offshore dredging is not causing these accelerated beach losses and coastal erosion – what is?

(2) Benthos and marine life sea bed spawning grounds.

Marinet argues it is essential to protect and restore biodiversity in dredged areas and areas destroyed by silt dumped from dredgers.

(3) Loss fishing areas for local fishermen.

(4) Tides and sediment Flows.

We need proof that the well established sediment flows along this coast are not being altered by offshore dredging.

(5) Maintaining the offshore sand banks along the Norfolk coastline.

These Sand banks are of vital importance to protect our coastline from storms and coastal erosion.

During the 1960`s the most significant offshore sand bank “Scroby Sands” had a three mile long dry section at low tide and even during high tides a large area referred to as “Scroby Island” was still left high and dry.

Prior to 1980 a significant portion of the top of Scroby Sands offshore sand bank was visible at all low tides, but now only a narrow section of Scroby sands is visible during low water spring tides.

Further evidence of the erosion of Scroby Sands is confirmed by the fact that during the installation of the wind farm on Scroby Sands it was found necessary to change the design of the wind turbine towers foundations to include anti scour rocks around their bases because of the predicted erosion rates of Scroby Sands sand bank.

A comprehensive underwater survey of Scroby Sands underwater site was carried out this year for the wind farm energy company to establish the changes in depth of the whole wind farm area seabed. One of the findings was that there was 5 metres of scouring, the mooring bases, set sixty feet down into the seabed, were only forty-five feet down and the wind-farm to shore power cable, originally placed in a concrete covered trench, was suspended eleven feet above the seabed.

Are you aware of any existing aggregates dredging operations which you think may be affecting your interests or activities?

(1) The cumulative effect of the intense aggregate dredging off the East Anglian coast from the massive dredging stretching from Caister-on-Sea in North Norfolk to Corton in North Suffolk.

(2) The continued dredging of Areas 436 and 202 near South Cross Sands Sand bank.

These dredging and re-dredging operations have altered the profile of this offshore sand bank.

The sea bed has also been noted as being lowered by at least 5 metres in some areas adjacent to Cross Sands Sand bank.

Four years ago the BMAPA announced that aggregate dredging would cease offshore to Great Yarmouth because of commercial exhaustion of stocks and concern of the environmental impact, and that dredging operations would move to the south coast. But it came as no surprise this year that an application for a Government View was placed by Hanson Aggregates Marine Ltd (HAMEL) in 2005 to renew the licence to further dredge from Area 401/2 offshore to Great Yarmouth. This company has dredged these areas for sand and shingle off the Great Yarmouth coast for the previous 15 years, but the licence was set to expire on March 31 2006 – now (in this EIA) for HAMEL you are proposing to extend dredging operation in area 202 from 2010 (when their current licence expires) for a further 15 years to i.e. to 2025 !!!

See: <http://www.marinet.org.uk/mad/objection.html#202>

What are the principal topics of interest to your organisation that the Environmental Assessment of the proposed dredging operations should consider? Please list them and say why they are important to your organisation.

(1) The accelerated loss of beach sand (beach draw down) and coastal erosion along the Norfolk and Suffolk coastlines since the 19 80's when the tonnages of aggregate removed by offshore dredging along this coastline were significantly increased.

Important to our organisation because of:

Loss of coastal communities. Loss of wild life habitats. Loss of natural beaches and recreation areas. Loss of fresh water marsh and other low lying adjacent areas.

Loss of productive farm land. Loss of coastal residential and holiday dwellings.

(2) The reduction in size and changes to our offshore sand banks.

Important to our organisation because:

These Sand banks are of vital importance to protect our coastline from storms and coastal erosion.

During the 1960`s the most significant offshore sand bank “Scroby Sands” had a three mile long dry section at low tide and even during high tides a large area referred to as “Scroby Island” was still left high and dry.

Prior to 1980 a significant portion of the top of Scroby Sands offshore sand bank was visible at all low tides, but now only a narrow section of Scroby sands is visible during low water spring tides.

(3) Protection of benthos and marine life sea bed spawning grounds.

Important to our organisation because:

It is essential to restore and protect seabed biodiversity in dredged areas and areas destroyed by silt dumped from dredgers.

(4) Carrying out a tracer test to check if offshore dredging causes beach draw down similar to the test that was carried out by Blackpool Council during 2007.

This test employed fluorescent tiny glass balls and radioactive tracer labelled sand and then tracking them to destination.

This test of course has intentionally not been performed by DEFRA or those employed by the dredging companies for EIA provision as it would conclusively prove that erosion was due to dredging, and that they certainly don't want revealed. The test was done by Blackpool Council because they became very worried when they lost 2" (yes - 2 inches!) of sand from their holiday beach. And where did they find it? In the aggregate landed by the dredgers!

(5) Your study should also include an up to date wave regime mode.

This model must use offshore, contemporaneous meteorological data in order to ensure accuracy of computation.

The wave regime model must take account of changes in the depth of the sea between the offshore sites and the coast and be based on the current spring tides high tide line – right up to the dunes/cliffs.

The changes in the nature of offshore sandbanks must be also included in the computations of this study.

The wave regime is a key factor in determining the erosive force of the sea upon the coast.

Has your organisation experienced any effects (positive or negative), which may be attributed to other dredging activities?

If yes please list and explain why you feel they are linked to aggregate dredging activities.

(1) The accelerated loss of beach sand (beach draw down) and coastal erosion along the Norfolk and Suffolk coastlines since the 19 80`s when the tonnages of aggregate removed by offshore dredging along this coastline were significantly increased.

We believe the cumulative effect of the intense offshore aggregate extraction from the massive dredging site stretching from Caister-on-Sea in North Norfolk to Corton in North Suffolk, between three and thirteen miles offshore has caused this – see Marinet website for evidence www.marinet.org.uk.

We also believe that this beach draw-down and accelerate coastal erosion will continue for many decades to come and the worst effect are yet to be experienced.

The lost village of Hallsands in the 17th. Century is testament to this. The ruins at the lost village of Hallsands has been described as a testament to man's folly.

The South Hams village was swept away by the sea in 1917, as a result of dredging in the bay. BBC Nature expert Andrew Cooper explained the processes and man’s folly of removing material from the seabed which caused this man-made disaster in his programme. It took 18 years from the start of offshore dredging to the final destruction of Hallsands village.

See: www.bbc.co.uk/devon/outdoors/nature/hallsands/shtml

Facts on increased cumulative tonnages of seabed material removed:

The Norfolk beaches, from Winterton to Scratby did not have the annual beach level sand losses and the sand dunes and cliffs did not show accelerated erosion prior to the 1980`s before the tonnages of seabed material removed by offshore dredging were significantly increased.

When offshore dredging commenced along the East 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, and in 1994 22 million tonnes were removed.

It is not possible to blame global warming and subsequent global sea level rises for this increased annual rate of erosion of the Norfolk coastline because:

The current rate of sea level rise due to global warming is 3.2mm a year and when you add the current 2.0mm a year of land sink (due to geological conditions) for the East coast of England this gives us a total equivalent annual sea level rise of only 5.2mm for the Norfolk coastline due to global forces beyond our control.

If offshore dredging is not causing these accelerated beach losses and coastal erosion – what is?

(2) The reduction in size and change in shape of our offshore sand banks.

These Sand banks are of vital importance to protect our coastline from storms and coastal erosion.

During the 1960`s the most significant offshore sand bank “Scroby Sands” had a three mile long dry section at low tide and even during high tides a large area referred to as “Scroby Island” was still left high and dry.

Prior to 1980 a significant portion of the top of Scroby Sands offshore sand bank was visible at all low tides, but now only a narrow section of Scroby sands is visible during low water spring tides.

Further evidence of the erosion of Scroby Sands is confirmed by the fact that during the installation of the wind farm on Scroby Sands it was found necessary to change the design of the wind turbine towers foundations to include anti scour rocks around their bases because of the predicted erosion rates of Scroby Sands sand bank.

A comprehensive underwater survey of Scroby Sands underwater site was carried out this year for the wind farm energy company to establish the changes in depth of the whole wind farm area seabed. One of the findings was that there was 5 metres of scouring, the mooring bases, set sixty feet down into the seabed, were only forty-five feet down and the wind-farm to shore power cable, originally placed in a concrete covered trench, was suspended eleven feet above the seabed.

Do you have any reasons to believe that your organisation is likely to experience any effects if a continuation licence is issued for Area 202 Cross Sands?

If yes please give the reasons.

Yes: (1) Reduction and changes to Cross Sands Sand Bank.

Areas 436 and 202 near cross sands sand bank are already intensively over dredged areas and your bathymetric impacts chart shows that in some location this area has been dredged to a depth of 10 metres and significant areas have been dredged to depths > 5 metres. This dredging of deep pits near the sand bank is and will affect its stability; profile changes to this sand bank have already been noted.

See the SCIENTIFIC REPORT OF SANDPIT PROJECT, April 2003-APRIL (2004 YEAR 2) MAY 2004, SANDPIT EC FIFTH FRAMEWORK PROJECT No. EVK 3-2001-00056
<http://sandpit.wldelft.nl/reportpage/reportpage.htm>

(2) Loss of benthos and marine life sea bed spawning grounds.

Marinet argues it is essential to protect and restore biodiversity in dredged areas destroyed by the dredging it's self and silt dumped from dredgers for the protection of many species of marine life and our precious eco system.

(3) Beach draw down and accelerated erosion of the coastline which also extends a considerable distance each side of the dredging area limits.

The Norfolk beaches, from Winterton to Scratby did not have the annual beach level sand losses and the sand dunes and cliffs did not show accelerated erosion prior to the 1980's before the tonnages of seabed material removed by offshore dredging were significantly increased.

When offshore dredging commenced along the East 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, and in 1994 22 million tonnes were removed.

See also evidence on:

Marinet Website. www.marinet.org.uk.

2003 EUrosion report (later modified due to government pressure) but was the considered opinion of renowned Geomorphologists when it was published.

www.euroasion.org/reports-online

Sent by: Linsay Jane Seiderer

Date 10th September 2008

Returned by: Mike King

For and on behalf of Marinet Great Yarmouth Norfolk Area 20 October 2008

Please complete and return by Monday 27th October 2008

To:

Dr. L J Seiderer

Marine Ecological Surveys Limited

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Or fax back 01225 444411