



Mr D C Spooner
Department for Communities and Local Government
Zone 4/B1
Eland House
Bressenden Place
London
SW 1E 5 DU

Mike King IEng. MIIRSM MInst.NDT
79 California Avenue, Scratby,
Great Yarmouth, Norfolk. NR29 3NS
m.king.insp.safety@totalise.co.uk



79 California Avenue
Scratby
Great Yarmouth
Norfolk
NR29 3NS
12th. June 2007

Your Ref: M14/-/2/92

Our Ref: HAML401/CLG/07/1

Application by Hanson Aggregates Marine Limited (HAML) to Continue to Extract Marine Sand and Gravel from Area 401/2 (A & B), off the Norfolk Coast

Dear Mr. Spooner

Thank you for the copy of your letter dated 11th. April to Dr. Ian Selby Hanson Aggregates Marine Limited regarding the above.

We are disappointed that after receiving over 400 objections from residents, local community action groups, Local Authorities and local Members of Parliament to the continued dredging along our coastline you have still granted HAML permission (via GV) to continue these operations until the end of 2013.

You have also (with out discussion) rejected the requests for a public inquiry; this inquiry was requested by local action groups because of large numbers of local residents, action groups and Local Authorities that strongly objected to the continuation of this offshore dredging, which (in the opinion of all the objectors) has caused accelerated coastal erosion along the Norfolk and Suffolk coastline – see details on pages 2, 3 & 4.

We know that (as referenced in your letter) HAML November 2005 Area 401/2 (A & B) Environmental Statement and Consultation Report prepared by Emu Limited (HAML Environmental Consultants) did not accept our historic evidence, EUrosion and other study reports, and local physical evidence that offshore dredging causes or accelerates coastal erosion; but as pointed out to the former Office of the Deputy Prim Minister) and to Emu/HAML in my review of this report Ref. MJK/L/0818/EMU dated 17 August 2005 and my subsequent letter Ref: MJK/L/D/ODPM dated 14 February 2006 this report contained several errors and many anomalies, it was also prepared by consultants who were paid by HAML, consequently we feel that it did not give an unbiased assessment of the situation.

A public inquiry would have given independent experts who are not commissioned by dredging companies a chance to present their evidence.

If the Government can not fund a full public inquiry the very least it can do (because of the weight of public opinion) is to commission its own independent study by Coastal Geomorphologists who have not previously carried out similar studies for HAML or other offshore dredging companies.

In your letter under Consideration paragraph 10: you state "The concerns of the local objectors over coastal erosion are not substantiated by scientific evidence" – but:

(A) The National Trust on their web-site under Industrial Development – Quarrying Quote:

"The dredging of sand and gravel on the seabed exacerbates coastal erosion"

web-site link: http://www.nationaltrust.org.uk/main/w-chl/w-countryside_environment/w-coastline

(B) The cumulative effects of intense commercial offshore seabed aggregate offshore dredging off the Norfolk and Suffolk Coastline have significantly reduced our offshore sand banks which are of vital importance to our coastal defences this is particularly so for Great Yarmouth as this area was developed from coastal silt/sand banks.

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

Prior to 1988 a significant portion of the top of Scroby Sands offshore sand bank was visible at low tides, but now only a small portion of the top of Scroby sands is visible during calm weather conditions on some 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 current and predicted erosion rates of Scroby Sands sand bank.

After a study of local conditions along the Norfolk and Suffolk coastline International recognised Coastal Geomorphologist Professor John Pethwick who is independent of the aggregate companies and environmental, organisations such as MARINET made the following statement in his report:

"Sand which supplies the shoreline comes from offshore banks, we must not dredge and place that dredged material upon the shoreline, otherwise it will increase the erosion, the very reverse of what is required!" - See full report on MATINET web-site www.marinet.org.uk

(C) The Fact that the cumulative effects of offshore dredging in areas of intense commercial offshore seabed aggregate extraction, such as along the Norfolk and Suffolk Coastline, have accelerated coastal erosion has been reported for Happisburg North Norfolk in the EUrosion Project Report - See Paragraph (1) Page 4.

In addition to the above scientific evidence the following is a summary of physical evidence, historic evidence and study reports which support our claim that offshore commercial aggregate dredging along this coastline is accelerating coastal erosion.

Local Physical Evidence:

I have been a resident near the cliffs at Scratby for 30 years I am also a Norfolk man who has visited the beaches along this stretch of coast line for as long as I can remember and I have observed that the Low and High Tide marks in this location have advanced at least 100 metres over the last 30 years with the most significant sea water rises and erosion losses during the last eight years – after the commencement of offshore aggregate dredging along this coastline.

Why these accelerated erosion losses can not be blamed on global warming or geological conditions: The movement of global tectonic plates is causing a tilting effect to the UK, Scotland is rising and the East coast is sinking by approximately 1mm per year and global warming climate change is causing sea levels to rise by approximately 4 to 5mm per year, these combined global effects are causing only a small annual rise in sea level (approximately 5 to 6mm per year) and consequently can not account for the accelerated beach level losses and coastal erosion which has occurred between Winterton and Scratby after the significant increases in tonnages of aggregates dredged from the seabed along this coastline.

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, in 1994 22 million tonnes were removed and aggregate extraction rates have continued increasing annually.

The beaches, from Winterton to Scratby did not have the annual beach level sand losses and the sand dunes and cliffs did not have accelerated erosion (as detailed below) prior to the commencement of offshore coastal dredging.

Winterton to Scratby erosion losses in recent years:

The dual sand dune banks which existed along Winterton and Hemsby valleys now have only half to one third of their last dune bank remaining.

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

Winterton sand dune cliff at the beach access has eroded to within a metre of the beach café.

The sand/marram grass cliffs from Newport to Scratby have had approximately 2 metres stripped from them every year for the last 6 years and during the spring of 2005 an average of 3 metres was stripped away leaving a 1.5 to 2 metre drop at beach access points.

In addition to the sand dunes and cliffs erosion the sand has been stripped from the beaches every year for at least the last 7 years and sucked into the sea, during 2004 and 2005 this beach sand stripping progressed to a depth of 2 metres stripped from the beaches between Newport and Scratby, this is causing the sea to encroach nearer the cliffs and consequently accelerating erosion.

Historic Evidence:

The ruin of the lost village of Hallsands Devon which was swept away by the sea on the night of 26 January 1917 serves as a reminder of the folly of interfering with the offshore seabed.

In the village of Hallsands the greatest sadness was that this disaster need never have happened. Its origins lay in plans, unknown to local fishermen at the time, to extend the naval dockyard at Plymouth.

The plans involved sand and gravel being taken from the seabed further up the coast.

Dredging began in the spring of 1897 and during the next four years some 660,000 tonnes of material were removed.

Activities were eventually stopped when opposition from several fishing villages grew as they saw their shingle beaches being relentlessly carried away.

It took 18 years from the start of dredging to the final destruction of Hallsands village.

It had been assumed that the removal of any shingle would be replaced naturally by more material that lay somewhere out in the channel.

We now know that the same shingle which protected Hallsands and protects the nearby villages of Beesands and Torcross was deposited thousands of years ago during the ice ages, and is not being replaced.

For more information visit: www.hallsands.org.uk or www.bbc.co.uk/devon/outdoors/nature/hallsands/shtml

Study Reports:

The following Coastal Impact Studies irrefutably link offshore dredging to coastal erosion:

(1) The EUrosion Project Report

The following is a quote from the EUrosion Project Report "Living with Coastal Erosion – Eurosion Policy Recommendations December 2003" in section 2.2.2. Human structures and activities have exacerbated coastal erosion:

"(ii) Aggregate extraction. Dredging of river and seabed for navigational purposes (i.e. deepening navigation channels) or constructional purposes (e.g. sand and gravel mining) removes an important amount of sediments.

This creates a sediment starvation which is in certain circumstances compensated by (re)activation erosion processes along the shore areas.

This has proved to be the case in a significant number of cases including Cove do Vapor (Portugal), the Western Scheldt estuary (Netherlands and Belgium), Donegal (Ireland), Cavado (Portugal), **and North Norfolk (UK)**. In some cases, dredging activities, by modifying the water depth in the near-shore area induce wave refraction which in turn modifies the long-shore and cross-shore sediment transport patterns."

(2) USA Navigation Study for Canaveral harbour Florida US Army Corps Final Feasibility Report and Environmental Impact Statement – August 1990.

The US Army Corps of Engineers dredged a channel 14 miles offshore to keep shipping clear, but in fact created a massive, hydraulically self-sustaining open pit mine offshore serving to denude the onshore coastline.

The report concluded that even though this dredging took place 14 miles from the coastline and it was a relative small project it brought about massive shoreline changes stopping previous accreting and causing highly significant coastal erosion.

Further study reports can be viewed on MARINET website: www.marinet.org.uk

Yours Sincerely

Mike King - MARINET Friends of the Earth Great Yarmouth

PS

25th June 2007

Dear Mr. Spooner this is a hard copy of the letter attached to my e-mail sent 12/06/2007, I would be grateful if you would confirm its receipt.