

Mr. Mike King  
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NR29 3NS  
17<sup>th</sup> August 2005

Mr. Jonathan Lewis – Project Manager  
EMU Ltd.  
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Your Ref: J/1/06/0786/JXL/33  
Our Ref: MJK/L/0818/EMU

cc.  
The Anglian Coastal Authorities Group  
c/o Terry Oaks Associates Ltd.  
PO Box 186  
Lowestoft  
NR33 OWY

**Re: Area 401/2 Offshore Coastal Dredging Licence Formal Consultation**

Dear Mr. Lewis

Thank you for your above referenced letter dated 29/07/2005 and enclosed TN1, TN2 & TN4 technical notes in response to my original objections letter dated 29/03/2005 and additional objections letter dated 07/05/2005.

You noted my main reasons for objecting to the proposed 15 year extension to the above licence in your letter, I have rephrased these to accurately summarise the main objections in my original letter dated 29/03/2005 as follows:

- Offshore Coastal Dredging Accelerates Coastal Erosion.
- Offshore Coastal Dredging is causing the destruction of seabed fish and other marine life including their spawning grounds.
- The renewal of Area 401/2 Offshore Coastal Dredging Licence contravenes the Kelling to Lowestoft Shoreline Management Plan (SMP) for Policy Unit area 3b14.

**Shoreline Management Plan (SMP)**

I would like to deal with this issue first.

I stand by my original statement “That the renewal application for Area 401/2 Offshore Coastal Dredging Licence contravenes the Draft SMP because Offshore Coastal Dredging is causing unnatural accelerated erosion to SMP Policy Unit area 3b14 coastline and the SMP Policy for this section of coastline is “NO ACTIVE INTERVENTION”, which also means no destructive interventions (such as Offshore Coastal Dredging) that alter the natural erosion and silt replacement processes”.

Offshore Coastal Dredging accelerates coastal erosion and interferes with natural sediment flows. Marinet website <http://www.marinet.org.uk/mad/madbrief.html> gives details of areas of previous Offshore Coastal Dredging where accelerated coastal erosion has occurred.

The Netherlands Delft University study assessing the impact of offshore sand and gravel extraction on shore stability prepared for the European Marine sand and Gravel Conference explains the mechanisms of beach draw down from offshore dredging

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Consequently you will note that all my correspondence to you has been copied to:  
The Anglian Coastal Authorities Group, c/o Terry Oaks Associates Ltd.

**Offshore Coastal Dredging is causing the destruction of seabed fish and other marine life including their spawning grounds.**

Your January Fisheries Resource Risk Assessment and July Fisheries Issues Technical note both accept that all seabed marine life will be destroyed in the dredged channels but you accept this because you say this destruction will have little impact on the total marine life along this coast because the anchor pattern on the seabed of the dredged areas will quickly re-establish its self consequently the sea bed dwelling marine species will re-establish themselves with in a short period of time.

Experience has proved the contrary for previously dredged areas.

No reestablishment of fish and other marine life in previously dredged areas off Aldeburgh and Southwold over the last ten years has been reported by the local fishermen.

- Marinet website <http://www.marinet.org.uk/mad/madbrief.html> gives details.

Your Risk Assessment and Technical note do not mention the fact that seabed marine life spawning grounds are also destroyed for a further five miles down tide from the dredging operations due to silt dumped during the dredging process which settles on the seabed.

**Offshore Coastal Dredging Accelerates Coastal Erosion.**

Your Technical Note – Review of Physical Processes at Area 401/2 – says that my statement that holes in wet sand (on the seashore or underwater) will be quickly infilled by the sides collapsing in is not valid, but likens the sand/silt infill of your subsea dredged areas to the sand flow of dunes in the Namibian desert??

As an ex Oilfield diver who has spent many dives using an air-lift to excavate silt from subsea pipelines to inspect them I can assure you that silt flows much more freely when suspended in water and fills in any excavations very quickly.

The Daily Express 16/08/2005 reports on the three year old girl that was buried alive in a hole dug in the wet sand on the beach at Towans Cornwall and the fact that she could not be saved because the sides of the hole were continually caving in.

Both the above experiences prove that wet sand and silt suspended underwater dose not behave the same as dry silt/sand flows in air, sediment flows much more readily underwater and the sides of holes excavated in wet sand or sand shingle mix cave in quickly and easily.

Consequently I believe that you have over-stretched your selves (with the comparisons to sand dunes in the Namibian desert) in the search for back-up information to support your clients application for renewal of the dredging rights and (with out prejudice) I propose that a government lead independent study should be completed before any continuation of offshore coastal dredging.

I still have not seen Your **Risk Assessment** stating the probabilities of accelerated coastal erosion by the continuation of the offshore dredging for the proposed 15 years duration expressed in terms of risk.

If offshore dredging is not responsible for our accelerated rate of erosion you still have not explained the accelerated beach sand drag-down, sand dunes and cliffs erosion from Winterton to Scratby since 1988 - after commencement of offshore dredging as detailed below:

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.

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 been eroded to within a meter of the beach café.

The sand/marram grass cliffs from Newport to Scratby have had approximately 2 meters stripped from them for the last 4 years and this year an average of 3 meters was stripped away leaving a 1.5 to 2 metre drop at beach access points.

The sand has been stripped from the beaches every year and sucked into the sea, for the past three years this has accelerated to a depth of at least 2 meters stripped from the beaches between Newport and Scratby, this is assisting the sea to encroach nearer the cliffs.

### **Sediment Flows**

You state (from HR Wallingford 2002 and Clayton 1998 Studies) that that the longshore drift sediments are gradually transported down the coast towards the Great Yarmouth offshore sand banks.

The Coastal Impact Study carried out for you by HR Wallingford (provided in response to my original objections) states in Section 6.7 The Effects of Dredging on the Coastline "A system of sandbanks between the dredged area and the coastline will prevent the direct interchange of material between the coast and the dredged area"

Therefore you are recognizing that material from these sandbanks will be drawn down to replace dredged material.

These Sand banks protect our coastline from erosion and if offshore dredging is causing sand/silt to be drawn from these sand banks this means that (as per your sediment flow studies) more sand/silt will be drawn from the beaches to replace it and consequently confirms that offshore dredging is accelerating coastal erosion.

The significant draw-down loss of beach sand level from Hemsby to Scratby every year confirms this effect which is allowing the sea to encroach nearer the cliffs and sand banks sea defences and consequently assisting the accelerated coastal erosion rate.

### **References:**

Marinet website <http://www.marinet.org.uk/mad/madbrief.html>

The Netherlands Delft University study assessing the impact of offshore sand and gravel extraction on shore stability prepared for the European Marine sand and Gravel Conference The mechanisms of beach draw down from offshore dredging – author E mail: [fcayocca@ifremer.fr](mailto:fcayocca@ifremer.fr)  
National Institute for Coastal and Marine Management of the Netherlands RIKZ

Web site [http://www.rikz.nl/home/NL/index\\_e.html](http://www.rikz.nl/home/NL/index_e.html)

Yours sincerely

Mike King