Mr. Mike King
Mas La Mer
79 California Avenue
Scratby
Great Yarmouth
Norfolk
NR29 3NS
m.king.insp.safety @ totalise.co.uk
14th. February 2006

Mr. Matthew Louis
Planning Directorate
Minerals & Waste Planning Division
Office of the Deputy Prime Minister
Zone 4/B1
Eland House
Bressenden Place
Victoria
London SW1E 5DU

My Ref: MJK/L/D/ODPM

APPLICATION FOR A GOVERNMENT VIEW: AREA 401/2 LICENCE

Dear Mr. Louis

Thank you for your letter of 16 January 2006 and for the opportunity to respond to the UK Government ODPM (the licensing authority) on the above Re Licensing application.

I am extremely concerned regarding the increasing rapid erosion of the vulnerable soft sand and marram grass sea defences and the significant loss of beach sand levels along this section of coastline (Winterton to Scratby) since the commencement of offshore aggregate dredging.

Technical reports (as summarised in this letter) and evidence of this accelerated coastal erosion confirm that the cumulative effect of the intense offshore dredging operations adjacent to Great Yarmouth are responsible.

Over 135 million tonnes of offshore aggregates has been dredged from the Great Yarmouth and adjacent areas over the last 15 years this is a much greater exploitation of the seabed than any other area in the world, and (as explained above) this section of the Norfolk coastline has the longest sections of exposed vulnerable soft sand and marram grass as its only sea defenses; consequently it has suffered a much more accelerated rate of coastal erosion.

Two years ago the BMAPA announced that aggregate dredging would cease offshore adjacent to Great Yarmouth (the location of Area 401/2) because of exhaustion of stocks and concern regarding the environmental impact and would move to the south coast; but HAML are now applying to renew their license to continue dredging Area 401/2 until 2013?

I confirm that I am not satisfied with the explanations in the HAML Consultation Report 2005 (prepared by Emu Ltd.) enclosed with your letter, and consider that my objections listed in my letter to Emu dated 17/08/2005 – and detailed on the next page - have not been satisfactorily answered.

Original Objections

(1) Offshore Coastal Dredging Accelerates Coastal Erosion.

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

(3)The renewal of Area 401/2 Offshore Coastal Dredging Licence contravenes the Kelling to Lowestoft Shoreline Management Plan (SMP) for Policy Unit area 3b14.

The following backup evidence for Objection (1) ignored:

Non UK Coastal Impact Studies that give irrefutable evidence that Offshore Dredging, in some instances as far as 14 miles offshore, caused accelerated coastal erosion.

A selection of these are reports are listed below:

(A) 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 modify the long-shore and cross-shore sediment transport patterns."

Note:

Addendum to the EUrosion Project Report December 2005

"Since the EUrosion report was written two years ago, following studies of further UK dredging in the Wash and off Great Yarmouth, it has been found that the main original North to South sediment flow has all but ceased.

Consequently during 2005 beaches such as Sea Palling had to receive regular recharging.

(B) 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.

Denial that excavated seabed areas infill - Objection (1) - but:

In September 2002 a new application by United Marine Dredging, a sister company of United Marine Aggregates, asked for a new licence to dredge a further 7.5 million tones of sand over 15 years from Area 254 (known as Cross Sands) situated 10km offshore from Great Yarmouth, it was approved.

This area had already been dredged twice in the past 15 years and was declared exhausted, yet new aggregate had appeared, a process claimed impossible in Emu Environmental Statement and Coastal Impact Study as they claim that the seabed along this coast is not mobile!

This new infilled sand could only have come from our eroded beaches and shoreline from Scratby to Winterton.

Denial that offshore dredging is eroding Scroby Sands and interrupting the sediment flows to Scroby Sands and our other offshore Sand Banks – Objection (1) Re. Sediment Flows. But the following evidence supports the fact that Scroby Sands and our other offshore sand banks are rapidly diminishing:

Visible evidence of the loss of height and reduction in size of Scroby Sands particularly since 1988 after commencement of Offshore Aggregate Dredging:
Scroby Sands has receded at the Scratby (North) end where the wind farm is now situated as prior to 1988 you could see the top at low tides now it is not visible even during low water Spring Tides.

The wind farm towers had to have anti scour rocks positioned around them; this was a modification to the original design.

30 years ago the total length of Scroby Sands was visible at low tides and the 1966 Great Yarmouth Pictorial Souvenir Guide States" At low tide they (Scroby Sands) are three miles long and nearly a mile wide in places.
At high tide much of the bank is submerged but there is still a large area left high and dry".
This certainly is not the case today as none of the bank is visible at high tides and only small southern portions visible at some of the lowest low tides.
Also the bank does not have a three mile long above water section at low tide now.

Please also note the following quote from the Coastal Impact Study Report submitted with Emu Environmental Statement:
Area 401/2 Dredging Licence Coastal Impact Study Report EX 5030 August 2004 carried out by HR Wallingford states:
"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"
Thus he is admitting that material from these sand banks will be eroded by the dredging to prevent beach draw down.

These offshore sand banks are an important part of the sea defenses for the Great Yarmouth coastline area as they reduce the energy of wave attack on the shoreline but continuous offshore dredging is rapidly diminishing them.

Emu reports state that destroyed seabed fish and other marine life spawning grounds soon recover Objection (2) but:
Local fishermen confirm that areas dredged off Aldeburgh to provide aggregate for Sizewell Power station construction work have not recovered in 15 years?

Objection (3) Offshore Coastal Dredging contravenes the Draft Kelling to Lowestoft Shoreline Management Plan (SMP) policy of "No Active Intervention" for area unit 3b14 (Winterton to California) stated as not relevant but:
The offshore dredging companies operations along this coastline are accelerating erosion of the offshore sand banks, beaches and coastline in my opinion this environmental destruction constitutes "Active Intervention" consequently I request the ODPM to stop all offshore dredging along this coastline pending the outcome of a public inquiry led by an independent expert.

Comments on HAML Marine Aggregate Extraction Licence Area 401/2 (A&B) Environmental Statement for a Renewal of the Licence Consultation Report 2005
This report is very padded out with technical notes previously received and copies of **all** their reply letters to complainants, but there is only a very brief summary list of the complaints - and they do answer all the complaints.
Too much of the report is devoted to the need for aggregates and the report states that all technical concerns have been addressed when they have not.

Conclusions
The distance of 22km offshore referred to in Emu reports as the location of Area 401/2 is to the centre of the area, the nearest edge of this area to the shoreline is 17km.
Evidence of previously offshore dredged areas and detailed in this letter concludes that the distance of offshore dredging from the shoreline dose not prevent it from causing accelerated coastal erosion but merely increases the time delay before coastal erosion occurs.

Because of the over exploitation of the seabed during the last 15 years along this vulnerable soft sand and marram grass coast line I request immediate cessation of all offshore dredging operations along the Norfolk coastline.

In view of the overwhelming number of outstanding objections (mainly from the general public) to the renewal of the licence for HAML Marine Aggregate Extraction Licence Area 401/2 (A&B) a public inquiry, led by an independent expert who is not under contract, being paid by or has previously carried out studies for HAML should be instigated if/before any extension of this licence is considered.

Yours sincerely

Mike King

ABBREVIATIONS
BMAPA - British Marine Aggregate Produces Association
ODPM - Office of the Deputy Prime Minster
HAML - Hanson Aggregates Marine Limited
MMS - Minerals Management Service (USA)
SMP - Shoreline Management Plan

References:
Marinet http://www.marinet.org.uk/mad/madbrief.html
EUrosion http://www.eurosion.org/reports-online
House of Commons Record of Debate on Shoreline Management (Norfolk) 8th. March 2005 Ref. 433H.
USA Minerals Management Service (MMS) www.gov/sandandgravel/PDF/REF-NEW.PDF

cc.
Tony Wright – Member of Parliament for Great Yarmouth
Constituency Office
21 Euston Road
Great Yarmouth
Norfolk NR30 1DZ