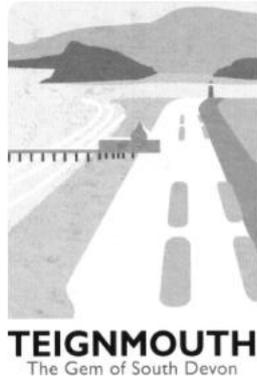


Teignmouth Town Centre Management Partnership



c/o Teignmouth Town Council
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Bitton Park Road
Teignmouth
Devon
TQ14 9DF

Ms L Williamson
Marine Licensing Team
Marine Management Organisation
Lancaster House
Newcastle Business Park
Newcastle Upon Tyne
NE4 7YH

19th March 2020

Dear Miss Williamson

Consultation on Application for Marine Licence Variation...MLA/2016/00372/2

The Teignmouth Town Centre Management Partnership (TTCMP) object to the above license because of the

1. Regulations say that "Only marine sediment (mainly sand, silt, clays) dredged from dock sites and navigation channels and small amounts of fish waste" may be disposed of at sea. The material from Exmouth Docks clearly goes beyond these regulations as evidenced by the black oily substance washed up on Teignmouth beach following earlier dumping at the Sprey Point site.
2. The Waste Hierarchy regulations do not allow disposal of such material at sea as a last resort due to difficulties in finding sites for sludge dewatering or because of on land disposal costs.
3. The sampling of the sludge for the original Licence was only taken from the top metre of material. It is highly unlikely that it is representative of the whole 50,000

tonnes for which the licence variation has been applied. Even so it exceeds Action Level 1 which means it cannot be disposed of at sea.

4. Exmouth Marina formerly operated as a commercial harbour for many years. Its seasonal docks were replaced by a permanent dock in 1825 and new docks were opened in 1868. Who knows what metals, oils, chemicals and other materials might have been dumped in the docks in the intervening 150 years? More representative sampling of the material is needed both around the dock and deep within the sediment. No licence should be granted until a comprehensive testing of the material to be dumped has taken place to prove that the material is legally compliant to be dumped at sea.
5. The supporting documentation for the licence variation application claim that “although there will be a number of impacts from increased suspended sediment, water quality, fishing and shellfish, displacement from diving fishing, grounds and so on”, the impact assessment claims that the impacts will be mostly negligible or in one case minor. The applicant claims that the potential sediment depositional thickness within the envelope are significantly less than 1mm.....within 72 hours of disposal activity the dredged material will have dispersed outside the disposal site...”. This is a throwback to the ‘Dilute and Disperse’ policies of the 1970s which resulted in the waste legislation we have today.
6. Such actions will be harmful to the environment and to the local commercial fishery.

Yours sincerely,

Edward Chorlton OBE CEng MICE FCIHT FRSA
Chair
Teignmouth Town Centre Management Partnership (TTCMP)
19th March 2020

The TTCMP is a partnership of Devon County Council, Teignbridge District Council, Teignmouth Town Council, Teignmouth Traders Association, and the Port of Teignmouth (ABP) which exists to protect and promote the interests of the economic, environmental and public realm aspects of the town centre. As such the quality of our bathing waters and the amenity of our beaches is of key importance to our objectives which is why we are responding to this consultation.