

Teignmouth Town Council

T. Higgs
Town Clerk



Town Clerk's Office
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TEIGNMOUTH
TQ14 9DF

Luella Williamson
Marine Licensing Case Officer
Marine Management Organisation
Lancaster House
Newcastle Business Park
Newcastle upon Tyne
NE4 7YH

4th March 2019

Dear Ms Williamson

Re: MMO Licence L/2017/0034/1 – Variation to Licence.

I am writing to you on behalf of Teignmouth Town Council as it appears that Teignmouth Town Council has again not been included as a consultee in respect of the current consultation on the licence variation request. This is very disappointing.

Firstly, and most importantly, Teignmouth Town Council and the people of Teignmouth are vehemently against the dumping of dredged material (sludge) from Exmouth Docks at Sprey Point (and PO075). I have included extracts from our local press for you to read.

Secondly, having read both the Cefas Lowestoft laboratory report and the Exmouth Marina marine licence variation environmental report, which are both very detailed and helpful to read, we wish to share our thoughts and concerns with you.

- 1 The proposed variations as per both the Cefas and report commissioned by Exmouth Marina (Howell Marine Consulting) are welcomed however, Teignmouth Town Council is adamant that there should be no disposing of material. The makeup of the dumped material 84% silt/clay even with dispersion will impact upon the aesthetics of the beach and that the beach is used all year round not just from the 1st February – 30th September (proposed non-disposal period).

The Howell Marine Consulting Report refers to (4.2) *'modelling results for disposal at the seaward edge of Site PO070 showed that Exmouth silt may be deposited on the beaches'* then goes on to say that *'this is likely to be re-worked and moved offshore during storm event'* this is not acceptable. We heavily rely on tourism all year round (not just the summer) and as you are aware any negative aesthetic changes to a beach do impact upon perceptions (dirty beaches).

- 2 There is no mention of or reference to the site PO050 being considered as an alternative site (PO075 mentioned) – we would like to know why? Is it purely down to cost of re-opening the site and the transportation of material to and from that site?

- 3 Should the MMO issue a licence with the variations as being proposed, Teignmouth Town Council would insist that the MMO would engage the services of Cefas as well as the Environment Agency in respect of material and bathing water sampling as it is considered imperative that bathing water samples are taken outside of the bathing season. Just because the proposed disposal of material is outside of the designated bathing season does not mean that the bathing waters are devoid of recreational use. In fact, there is an increase in all year round use as was evident most recently during the February half term and our lifesaving, canoe, triathlon clubs use the water all year round as do our stalwart recreational swimmers. Furthermore, there is no reference to bacterial counts in either report and as we know it is the bacterial counts that will dictate any possible harm to human health as well as elevated levels of trace metals (albeit the 'elevated levels were not so elevated to be a cause for concern and the material was considered acceptable to be for disposal at sea') for which many will be concerned about as lay persons.

Samples already taken (as is understood) are not core material samples so we would expect no less than the sampling of core material and as we know this can be done and has been done - beach recharge Dawlish Warren.

To summarise, Teignmouth Town Council and the people who live, work and play in our town do not want what is locally known as the 'Exmouth Sludge' disposed of and dumped on our doorstep and it is the duty of the Town Council to listen and act upon the voices of the people. People are angry, so we really hope that you do listen and do reconsider the issuing of a licence to dispose of the 'Exmouth Sludge' off Sprey Point (and PO075 if that became an option) here in Teignmouth.

Yours faithfully



Tracey Higgs
Town Clerk

Cc Cllr Robert Phipps