

Teignmouth Town Council

T. Higgs
Town Clerk



Town Clerk's Office
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Via e-mail
Luella Williamson
Marine Licensing Team,
Marine Management Organisation.
Lancaster House, Newcastle Business Park,
Newcastle upon Tyne,
NE4 7YH

10th March 2020

Dear Ms Williamson

Re: Consultation – Exmouth Marina.

Teignmouth Town Full Council met on Tuesday 25th February at Teignmouth Town Councillors discussed and debated the most recent document as commissioned by Exmouth Marina, produced by Marine Space. Please be minded that there has been a change of elected members since the previous consultation held (March 2019).

Teignmouth Town Council responds as follows: -

Teignmouth Town Council objects to the proposed disposal of material dredged from Exmouth Marina at Lyme Bay 2 under case code MLA/2016/00372/2. The proposal is non-compliant with the South Inshore and South Offshore Marine Plan (DEFRA July 2018) because: -

- It is harmful to the environment and biodiversity
- It is harmful to local inshore commercial fishery
- It is reputationally harmful to tourism, recreation and bathing water quality.

Environment and Biodiversity

South Inshore and South Offshore Marine Plan, "Objective 12:

To safeguard space for, and improve the quality of, the natural marine environment, including to enable continued provision of ecosystem goods and services, particularly in relation to coastal and seabed habitats, fisheries and cumulative impacts on highly mobile

species.” Provisions S-BIO-1 and S-DD-2 require mitigation of adverse impacts on natural habitats, and alternatives to marine disposal sites.

Inshore Commercial Fishery

Marine Space report “Exmouth Marina Licence Variation 2: PO050 Desk-based Site Scoping and Characterisation – December 2019” dismisses the effects of dumping on benthonic species as negligible but Lyme Bay 2 lies within the nursery ground for anglerfish, whiting, spotted ray thornback and plaice, and spawning mackerel and Spurdog. Target commercial species are crab, lobster, mussels, oysters and sole. A Brixham fisherman writes *inter alia*...

“The area in question is a highly active trawling area also it's one of the best areas for whelks and scallops (filter fish). The intended waste will completely blanket the area causing mortalities across the whole area completely wrecking the inshore fisheries. This area has been worked for hundreds of years by fisherman who provide themselves with an income working this ground, not for you to "willy nilly" dump your toxic waste on to an area which is fished by fisherman for a product that is for human consumption.

Please note that at the time of writing it is presumed that Devon and Severn Inshore Fisheries and Conservation Agency (DSIFCA) will oppose.

Tourism, recreation and bathing water quality

Holcombe, Teignmouth, Shaldon and Ness beaches all rate ‘excellent’ bathing water quality in the Environment Agency sampling scheme. However, this wasn’t always the case.

In recent years there has been very significant financial investment made by several agencies and community effort to prevent bathing water contamination Teignmouth beach being the sole and primary focus for this extensive investment.

The evidence of such investment is tangible. The bathing water quality has been elevated from the sufficient (on occasion poor) bathing water classification now to the highest standard as required under the revised European Bathing Water Directive. This means that Teignmouth Town Beach now has the much-coveted international Blue Flag award. The protection of the bathing water classification is paramount to the tourism lifeblood of Teignmouth. Too much hard work, money and effort has been expended in achieving Blue Flag status.

To visualise the quantity of material which can be dumped under this proposed license in one season, it roughly equates to the full load of three ships which export clay from Teignmouth. The Marine Space report for Exmouth Marina is a desktop exercise (around sixty pages) which depicts the effects of dumping as negligible when in fact the sea will be polluted and there will be reputation damage to local resorts.

Climate Change and increasing severe storm events.

The succession of recent severe storm events gives concern to the travel and dispersion of disposed material into the bathing waters and onto the shoreline. With the predicted likelihood that such weather events will increase (severity and number of) then we would have expected that due consideration would have been given to the affect that the dumping and dispersion of the material as being planned would have on the local environs.

Licenced Site – disposal

Should despite all efforts of those consulted to put forward reasoned arguments against the re-opening of the site PO050 and the variation to the licence and the site be re-opened and a licence granted to Exmouth Docks to be able to dispose of dredged material, would this then give licence to other similar materials being also disposed of at the site? If this is to be so, then any figures or data produced in the document are irrelevant.

Sampling

6.4.1 states that under Exmouth Marina's existing licence, further sediment sampling is to be undertaken by May 2021 to ensure the suitability of the material for disposal at the proposed site.

Again, it is noted that the sampling undertaken by Cefas in 2018 assessed that the levels of determinands were slightly elevated above Action Level 1 (but no cause for concern) recorded in the sediment. The report goes on to state that the sediment samples means negligible effects predicted on the chemical parameters of sediment or water quality.....

The sampling undertaken did not include core sampling of material. If the samples taken (not core samples) were slightly elevated above Action Level 1 it would then be expected that core samples would be more than just 'slightly elevated' which is not acceptable.

Summary

Teignmouth Town Council is vehemently against any dumping of any dredged material from Exmouth Docks (or similar waste) at any site.

Teignmouth Town Council is vehemently against any proposed variation to the licence (Exmouth Marina Licence).

Yours sincerely



Tracey Higgs
Town Clerk

cc Cllr Robert Phipps
Cllr Richard Ash