

Date Monday, 25 June 2012

National Infrastructure Planning  
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Dear NIP

Representation - Able Marine Energy Park

We wish to add further detail to our earlier representations made (No. 48)

We understand there is no set format for this. We wish to confirm should there be a public hearing or the opportunity to speak we would like to nominate someone to exercise this opportunity on our behalf.

Could you please confirm receipt of this letter?

Regards

Garry Lyons  
Chairman Stone Creek Boat Club.



Reference No.ABLE - 0010

Monday, 25 June 2012

National Infrastructure Planning

Able marine Energy Park

Representation On Behalf of the Stone Creek Boat Club

We wish to add further detail to concerns raised in our initial representation (No.48)

The Stone Creek Boat Club has existed as a properly constituted body for over 50 years and enjoys the exclusive right to moorings at Stone Creek which in turn gives us unrestricted Navigation into the Humber.

The proposals as set out by the developer, if implemented would effectively, by virtue of silting up, prevent navigation into the Humber and therefore would threaten the very existence of the Stone Creek Boat Club.

We do not believe it is the responsibility of the Stone Creek Boat Club to review and comment on the developer's proposals line by line rather it is the developer's responsibility to investigate all consequences of their proposals and to provide mitigating solutions in response. The Developer in the documentation and actions taken thus far has failed to do this.

We have concerns about the accuracy and quality of the Black and Veatch document produced in support of the developer.

With generations of experience and knowledge of how the Stone Creek works, action of the tides, the movement and accretion of silt, members of the Stone Creek Boat Club are possibly best placed to understand the implications of the developer's scheme.

The developer nor Black and Veatch have not approached the Stone Creek Boat Club either for valuable local advice or to understand and address our very real concerns for the scheme.

The Black and Veatch document makes a close link between the Cherry Cobb Sands site and an earlier scheme at Paull Holme. Results and findings at Paull Holme are used in detail to predict outcomes at Cherry Cobb Sands. We believe the two schemes are significantly different and any detailed comparison is not valid.

Paull Holme is situated on a dynamic fast flowing part of the river adjacent to a deep maintained channel. Cherry Cobb Sands on the other hand could be described as sedate, well away from any dynamic effects of the Humber. The nature of silting in the adjacent river sections is very different.

Black and Veatch make use of silt accretion data from Paull Holme which we believe is not valid for Stone Creek for the reasons given. Silting levels at Stone Creek are likely to be much higher than those described at Paull Holme.

Black and Veatch describe in support of the scheme the presence of an existing drainage channel across Foul Holme Sands opposite the compensatory site (2.3.4) this channel exists only on Google Earth, there has been not channel of any significance across the Foul Holme for more than 20 years.

Safe navigation across the Foul Holme Sands is no longer possible due to the increasing build up of mud accrued in the past decade.

Black and Veatch have made extensive use of a computer model to predict outcomes at Stone Creek and the inner Channel. There is almost no printed data available on the tide flows, water depths and silt accretion in the study area. The developer has not made any site measurements to collect data in support of the model. We therefore question the validity of the model and usefulness of the predicted outcomes.

The model has been run on very selective tide levels insufficient ranges have been used to give a comprehensive outcome.

The Black and Veatch report suggests erosion in parts of the Foul Holme Sands (4.3.3) the level of the Foul Holme Sands bank is rising all the time, in the experience of the Stone Creek Boat Club there is very little dynamic movement of water over the bank.

The Black and Veatch report acknowledges, but does not go into any detail possible increases in sedimentation at Stone Creek + the Battery (known locally as) 4.5.4 Given the significant impact any build up of silt will have on these two area's consideration given by the developer is woefully inadequate.

Any silting up of Stone Creek will reduce water flow out of the level drainage, which will in turn further increase silting. Any build of silt will make navigation very difficult or impossible. The developer has failed to understand the significance of silting in these areas.

The larger volume of water passing the Stone Creek out fall is likely to produce a high mud bar further impeding navigation. The Black and Veatch report gives an error in predicting sedimentation of + or - 50%. Given the dire consequences of increase silting the adequacy of the Black and Veatch report is not acceptable.

Navigational and drainage access to the main river is via a channel at the Battery (Known locally as) The Black and Veatch report states silting in this area is likely to increase. Any silting would reduce water levels and flow rates further impeding navigation and drainage. The developer has failed to give proper weight and consideration to the consequences.

The developer has not given any long term assurances on maintaining water flows through Stone Creek or the inner channel and access to the Humber at the battery. Considering how important maintenance and upkeep of water levels and Navigation are this is not acceptable.

The Developer has not made provision for carrying out detailed surveys of the existing conditions nor are there proposals for agreed trigger levels when silting or dynamics are affected. There is no indication or reassurances from the Developer setting out their long term responsibilities to the Stone Creek Boat Club, the Level Drainage or others.

The developer's proposals entitled Navigation 3.1.8 give no consideration to Stone Creek Boat Club or visitors.

Garry Lyon  
Ref No. ABLE 0010