

THE ALDE & ORE ASSOCIATION

Your Voice- Your Estuary



Licensing Team
East Suffolk Council
Riverside, 4 Canning Road
Lowestoft,
Suffolk NR33 0EQ

26 November 2024

Licensing of Jet Ski/water scooter Commercial Operators

Dear Licensing Committee

The Alde and Ore Association has some 2000 members. (Registered Charity No. 1154583). Its charitable objectives are to preserve for the public benefit the Alde, Ore and Butley Creek rivers and their banks from Shingle Street to their tidal limits and such of the land adjoining them or upstream as may be considered to affect them, together with the features of beauty and or historic or public interest in that area.

The Association is submitting its views as the Deben, like the other Suffolk estuaries, is a fragile environment set in the National Landscape area of Essex and Suffolk Coast and Heaths (formerly AONB). The Suffolk estuaries are all relatively narrow, far more so at low tide, making very fast and noisy craft incompatible with the environment and other quieter and slower users. These Suffolk estuaries are all subject to several national and international environment protection designations: jet skis would not fit with such designations, being more suited to open sea areas.

Our response to the issues on which the Council is seeking views is:-

1. Whether the Council should license jet skis?

The Association finds that the main reasons for not licensing jet skis and so encouraging jet ski activity in the Deben or any Suffolk estuary include :-

- Jet skis are dangerous to humans and wildlife (they can reach speeds of up to 60 mph and have no brakes),
- would disturb wildlife habitats contravening wild life protection orders,
- pace of jet skis is likely to cause safety issues with other water sports like sailing, canoeing and swimming all of which go more slowly,
- the wash of jet skis could cause substantial erosion of the salt marsh banks (a valuable national asset both as rare habitat, flood defence and carbon sink),
- Jet skis can cause noise pollution (up to 115 decibels): the noise levels would ruin the quiet natural environment (a key attraction for our local visitor industry) and also noise carries most easily over water exacerbating the situation,

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-Jet skis could cause fuel pollution (unburned fuel released into the water), and contribute to air pollution through the emission of hydrocarbons, nitrous oxides and carbon monoxides etc,

Background: in the Alde & Ore there are already rules set against the use of jet skis, including no launching from Orford Quay or Aldeburgh Yacht Club. There is also a designated area for water skiing down below Dove Point.

2. If they were to be licensed what conditions if any should be imposed?.

a) they should conform to existing rules, in particular speed limits and including specified areas of operation, such as those areas allocated to water skiing where there is more space and fewer users . Existing rules would include any statutory byelaws or local byelaws of harbours or byelaws of sailing clubs on speed and zones,

b) they should avoid wildlife sensitive areas- conditions should include restricted areas of free operation, such as exist for water skiing, speed limits on routes to and from launching to free areas including keeping to 4 and 6 knot rules applying to all other water craft,

c) arrangements would need to be made for specific launching sites where they could launch and then get to a place with enough open water, like designated waterski areas, without excess noise and speed. This includes passages through mooring areas where limited space between craft could be dangerous,

d) training levels: jet skis are powerful machines and some level of competence must be proven before a skier can be permitted to drive a jet ski alone,

e) to ensure that all is understood, there should be a code of practice about safe jet skiing at any time with extra details for local considerations such as wild life zones, mooring passages and similar.

3. What minimum specification should be required?

There should be - noise abatement on machines,
- specification of types of fuel used, and
- requirements for maintenance to ensure safe operation

4. Should zones of operation be imposed?

Yes, including avoiding times/seasons of winter and spring migrant bird passage, breeding months (birds, seals and water voles and similar),

Also to avoid sailing and kayaking training areas when they run during the summer,

Passage through moorings should be permitted but no circling , speeding and similar activities.

5. Should dates and times of operation be imposed?

Yes

a) to avoid the most sensitive times of year for wild life disturbance, and so meet specifications in

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the various environmental protection orders. These may vary by estuary but have national and internal force of law: they include RAMSAR sites (designated under the Ramsar Convention on Wetlands of International Importance), Special Protection Areas (designated under the EC Habitats Directive which is still part of UK law), Special Area of Conservation (also designated under the EC habitats Directive, National Nature Reserve and other sites of environmental importance including County Wildlife Sites, RSPB reserves, Suffolk Wildlife Trust reserves and National Trust Reserves.

b) avoid low tide as the water space in estuaries can be narrowed considerably at low tide.

6. How should the policy be enforced?

-Enforcement of dates, times, speed and locations would require regular policing in situ, not periodic visits. Signage/ buoys would be needed.

-The cost could be considerable and should be met by the jet ski operations and their clients.

- All arrangements should be discussed and agreed with all water users in an estuary.

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