



BROOMHILL SANDS SEA DEFENCES DOC RESPONSE TO EA SCOPING CONSULTATION MAY 2010

Conclusions

DOC fully supports the Broomhill Sands sea defence scheme as part of the network of schemes along the coast from Camber to Hythe that will, when completed, give Romney Marsh a 1-in-200 year standard of sea defence.

We have a number of comments on the EA's Scoping Consultation document of May 2010, as outlined in the detailed responses below, but our main areas of concern are as follows:

- It is essential that the schedule for the Broomhill Sands scheme is not subject to any further delays, and that construction begins in Winter 2011. Whilst we fully understand the difficulties involved, Broomhill is the first stage of the second phase of a range of upgraded defence schemes across Romney Marsh. Dymchurch is nearly completed, and Broomhill will be followed by projects at Hythe and then across the Lydd Ranges. Delay for Broomhill will have a significant knock-on effect on the schemes still to come, which include sections (e.g. the Galloways section of the Lydd Ranges) that are already approaching a critical risk level. Further, given that any sea defence is only as strong as its weakest part, any delays to the overall scheme will undermine integrity of the new defences at Dymchurch. And all this must be seen in the context of the 1-in-5 standard of the current sea defence which is putting the integrity of the whole of Romney Marsh at serious risk
- The tie-in of the new Broomhill Sands defence with that of Lydd Ranges is a critical part of the overall scheme, given that any sea defence is only as strong as its weakest part. This applies to the permanent solution which will be in place after 2020 when the Lydd Ranges scheme has been completed, but also to the interim period between completion of the Broomhill scheme and commencement of work of the Lydd Ranges frontage, which could be as long as four years
- A thorough survey of nearby properties before, during and after the construction work is essential, given the amount of vibration involved and the proximity of buildings. This needs to be agreed between the EA and local property owners well before the start of the work, and needs to cover the measures to be taken should damage occur.
- Consultation with local stakeholders, including DOC, must continue as the design of the scheme is finalised, and throughout the funding application and construction planning stages. This will not only help to maintain support for the scheme amongst the Romney Marsh community, but will give the EA access to valuable local experience and detailed expertise.

Detailed Response

Paragraph numbering as per EA Scoping Consultation Document May 2010
Key responses in **bold**.

2.1.2

We fully support the need to increase the sea defence at Broomhill to a 1-in-200 year standard as part of a network of coastal schemes across Romney Marsh. This is essential if the integrity of the sea defence of Romney Marsh as a whole is to be maintained

2.2.1

We would expect the EA to adhere to the European Landscape Convention 2004, the Code of Practice on Conservation Access and Recreation 2000 and the Camber Environmental Strategy 2006. The stretch of beach from Camber Sands to Dungeness, of which Broomhill Sands is a key part, is a unique amenity within such close reach of London, as well as a focus for recreational activity that is helping to regenerate the village of Camber and the surrounding area. We see it as vital, despite the current economic constraints, that the new sea defence does not adversely affect the visual, amenity or recreational potential of Broomhill Sands along its whole length, and not merely a 700m stretch at the Suttons.

2.2.2

We would challenge the statement, under the section headed 'Coastal Management', that '...Shingle recycling has affected the natural evolution of Dungeness', and we would ask for it to be removed from the final document. As we have consistently pointed out, the so-called 'natural evolution' of Dungeness has been affected by a variety of factors – principally the construction of the extended Rye Harbour groyne. To attribute it solely to shingle recycling makes it harder to find a solution to the issue of the Dungeness Borrow Pit, towards which, as you are aware, we are working hard with Natural England.

2.2.7

We would ask for confirmation from the EA and Natural England that the latter's proposals to extend both the SPA and the Ramsar site will not be used as a pretext to block, amend or delay the Broomhill Sands sea defence scheme, or any of the other schemes proposed for Romney Marsh by the EA, whose timely completion will give the Marsh the level of sea defence it requires to preserve its unique environment for future generations.

2.2.10

Please see notes about the need to preserve Landscape Character and Visual Amenity under 2.2.1 above

2.5

We are concerned by the reference to the uncertainty surrounding the scheme's funding, particularly in the light of previous EA assurances that the funding for the Broomhill Sands scheme was effectively ring-fenced. However, we recognise that the changed economic circumstances and an unfortunately-timed revision of the rules for calculating the priority of sea defence schemes have both impacted the financing plans. We would suggest therefore that the PAR and funding application are prepared as rapidly as possible. We would also offer any assistance that the EA feel would be helpful in supporting the funding application.

2.6

We fully support Project Objectives 1-3 outlined in this section, and 4 to the extent that it does not adversely affect implementation of the scheme.

3.

We fully support the Opportunities outlined in this section, and would urge the EA to make every effort to implement them despite the constraints of the economic climate. We stand ready to offer any assistance we can to achieve these objectives.

We also support the application to the Arts Council for a grant to develop artwork appropriate to the site, and created with the involvement of the local community. With that in mind we have volunteered members of DOC to sit on the Steering Committee, and are attempting to facilitate the involvement of a Camber community group for the application itself.

4.3

We understand the need to keep costs down, and therefore the rationale for a phased construction at the Jury's Gap end of the scheme, utilising the existing blockwork wall. We would however ask that the design is integrated so that it blends effectively with the completed rock revetment and does not look unfinished or visually inappropriate. And that the design of its toe protection is designed to minimise scouring of the existing sand beach.

We have been consulted on the design of the revetment wall, the materials proposed, the finishings and the access points to the beach, and we have made our comments within the context of the Interest Group and the Design Board. We are pleased to see that one of our suggestions has already been implemented - the re-siting of one of the sets of access steps at the Jury's Gap end to a position more aligned with likely pedestrian traffic - and we have been assured that a related suggestion – the addition of an extra set of access steps opposite the houses to the east of the Car Park – is being considered. We would ask that further suggestions, such as the design of the toe of the wall to minimise beach scouring, will be given due consideration as the design is finalised. We would also ask that the lessons of the Dymchurch scheme be learnt and incorporated in the planning – e.g. ensuring that the access steps are designed so as to make the parts submerged by the tide less slippery, and the use of some form of paint or other coating that facilitates the removal of graffiti.

One of our major concerns is the timing of the work, and that the schedule of construction commencing Winter 2011 is adhered to. Bearing in mind that we were originally given an outside date of early-2006 for commencement of the

work, and the average 1-in-5 year assessment of the current sea defence (falling to as little as 1-in-3 at key points such as Galloways), time is of the essence and further delays increase the risk of a serious weather event leading to a catastrophic breach. Broomhill is the first stage of the second phase of a range of upgraded defence schemes across Romney Marsh. Dymchurch is nearly completed, and Broomhill will be followed by projects at Hythe and then across the Lydd Ranges. All these projects are interdependent, and any further delay for Broomhill will create a log jam that will have a material effect on the schemes still to come. Further, given that any sea defence is only as strong as its weakest part, the integrity of the sections already underway, such as Dymchurch, will be at risk until the other schemes have been fully implemented.

The tie-in with the Lydd Ranges sea defence is another of our key concerns, both in the short term (between completion of the Broomhill Sands scheme and commencement of work on the Lydd Ranges frontage, which could be as long as four years) and in the long term (once the Lydd Ranges scheme has been completed in 2020). With regard to the latter, we are encouraged that a roundhead solution is being proposed to maximise the solidity of the join to the Green Bank whilst minimising scour potential on the beach, although we would urge that great attention is paid to the detailed design to ensure that it achieves both those intentions. As regards the former, we note the low flood risk assessment outlined in the relevant Appendix, but would emphasise the need for the EA to maintain a fully effective shingle recharge programme until such time as the work on the Lydd Ranges scheme is completed. It would be unacceptable to both government and stakeholders for the EA to spend over £100m on a new sea defence for Broomhill Sands only to have the sea run round the edge of it and cause significant damage.

4.3.1

Another of our key concerns, and one that is not fully dealt with within the current document, is a programme of inspections of all nearby buildings before, during and after the work to monitor its effect, particularly as this has proved a contentious issue at Dymchurch. There is a reference under ‘Population’ to a vibration zoning map and pre-condition surveys, as well as ‘independent vibration monitoring’ during the work. However, this falls short of a full before-and-after examination, and it is essential that an agreed survey process is in place before work commences, given the amount of vibration involved in the work and its proximity to housing. Measures to be taken in the event of damage also need to be agreed beforehand to avoid the unwelcome prospect of subsequent litigation.

We fully support the use of natural resources, including the recycling of disused groynes to create furniture and facings for the pedestrian section of the wall.

6.2

Although there have been some hiccups along the way, we welcome the consultation that we have been afforded by the EA so far on the Broomhill Sands scheme.

It is essential, both to retain the support of the Romney Marsh community and to access valuable local experience and expertise, that such consultation continue as

the design is finalised and the planning moves towards the funding and construction stages.