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13 October 2011

Kent County Council Planning Application

Ref No KCC/SH/3081/2011

Applicant: EDF Energy Nuclear Generation Ltd & Environment Agency

Location: Dungeness Borrow Pit, Dungeness, Romney Marsh, Kent TN29 9NA

Defend Our Coast (DOC) wish to lend their support to the above application for the following reasons:

- The recharge of shingle to the frontage between Broomhill and Denge is vital to the protection of the whole of Walland and Romney Marsh - much of which lies below spring tide level.
- The Environment Agency have spent much time and money improving the sea defences from Dymchurch to Littlestone whose usefulness will be wasted if the sea is allowed to attack from the rear.
- The Lydd Army Firing Ranges, not only being vital for this country's armed forces, are also home to several species of flora and fauna including the Holmstone Holly which would be lost in a tidal inundation.
- Similarly, the beach behind the power station contains an aquifer used by Veolia Water Company. In the past, boreholes nearest to the shore were closed due to tidal inundation.
- The cost to the taxpayer of importing shingle from inland quarries would be far more expensive and waste valuable building resources to be used in a single operation. By importing shingle rather than recycling, surely the foreshore beyond the Dungeness Point would be artificially increased which should defeat conservationists arguments for natural development.
- Although the protection in front of the Power Station is at present adequate, the frontage immediately to the west of the site is woefully inadequate and when the sea breaches through, the switch house complex will be vulnerable to inundation from the side.

- DOC would add that the Power Station operators and the Environment Agency and its predecessors successfully operated the same operation from the proposed site with little opposition since the power station was constructed in the mid 1960's and recycling continued from the Borrow Pit until 2007.
- Regarding the annual quantities proposed, DOC would hope that in the light of proposed sea defence improvement schemes to Broomhill and Jury's Gap being delayed by budget cuts and due to the unpredictable nature of the weather, consideration be given to an **annual review of the proposed shingle quantities** to be excavated in order to enable adequate sea defences to be maintained in the interim and that such review should form part of a condition attached to the planning consent, if granted.

We hope these relevant points are helpful to your committee in forming a favourable opinion and would recommend a visit to Denge Outfall which clearly demonstrates the points made above.

Defend Our Coast Association