



Maritime &  
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Agency

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Sent by email to: [planning@canterbury.gov.uk](mailto:planning@canterbury.gov.uk)

Your ref: CA/022/00888

15 June 2022

Dear Sir/Madam

### Consultation on Beach Safety Assessment – Whitstable Beach

I am writing in response to the current consultation on the document titled *Beach Safety Assessment – Whitstable Beach (Neptune to Harbour)*, dated 05/04/22, which has been completed in response to condition 04 of appeal decisions APP/J2210/C/18/3209297, 3209299 and 3209300. The Maritime and Coastguard Agency (MCA) has reviewed the above document and whilst comments were sent to Foreshore Services at Canterbury City Council in June, I have provided them below:

1. It is not clear who has completed the assessment. This would provide integrity to the document and its ownership.
2. Section titled “Overview”:
  - a. The section begins by stating “This policy has been created...”, however it is not clear to whom this ‘policy’ belongs and how it would be implemented. It was understood this document is an assessment of the beach safety risks and how it will be managed.
  - b. It would be helpful for the Overview to be more specific on the ownership of the foreshore, by whom, and what rights they have.
3. Section titled: “The Scope of this document”:
  - a. The section refers to a ‘map’ on page 7 which appears to be a Google Earth image, or something similar. This image does not show the oyster trestles nor the wider area for context. We would recommend more accurate images are used.
  - b. The section states the document will be reviewed, however it does not state the frequency of review. It also does not confirm who will conduct the review and what the outputs will be.
4. Section titled: “About the Assessed Area”:
  - a. The third paragraph states “The farm is not visible at high tide when it is submerged”, however, a recommendation of the Navigation Risk Assessments (NRA) completed in 2017 and 2019 was to mark the ends of the trestles so their positions would be visible at all states of tide. It is disappointing to hear this risk control measure for ensuring safety of other marine users has still not been implemented. The implication of this is that the risks associated with the hazards identified in the NRAs have not been reduced to As Low As Reasonably Practicable (ALARP).
5. A list of recommended risk controls should be included and confirmation on whether they will be actioned and by whom.

6. The risk assessment does not appear to have considered the views of local stakeholders. Since it is not known who completed the assessment and local stakeholder views have not contributed, it is difficult to understand the accuracy of the risk scores.
7. The assessment does not confirm how the report will be used in the future. It identifies 'actions' within the hazard log, however it provides no recommendations for reducing the risks to beach users. The report has been created on behalf of the Whitstable Oyster Fisheries Company (WOFC) and we would recommend the WOFC provides confirmation of their intentions and a timeline for adopting the actions and risk control measures in this assessment as well as those identified in the NRAs completed in 2017 and 2019.

I hope the above comments are useful.

Yours faithfully,



Nick Salter  
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