



## Policy & Resources Committee

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Presiding Officer  
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14<sup>th</sup> February 2020

Dear Sir

### **Letter of Comment – Requête – P.2019/143**

**Suspension of carrying out of works further to proposals for the partial removal of the anti-tank wall in the eastern part of Pembroke Bay (L'Ancrese East) and the managed re-alignment of the coastline in that area**

I refer to the above Requête which is scheduled for debate by the States of Deliberation on 26<sup>th</sup> February 2020.

Deputy Brouard and six other Members of the States of Deliberation are seeking for the States to agree to:

1. agree that the carrying out of any works to implement the managed realignment of the coastline at L'Ancrese East as set out in Section 7 of the Policy Letter of the Committee *for the* Environment & Infrastructure dated 18<sup>th</sup> August 2017 and described in Section 6, Volume 1 of the report "Guernsey Coastal Defences" prepared by Royal Haskoning Dhv further to the Resolution of the States made at their meeting on 29<sup>th</sup> September 2017 be suspended;
2. agree that the period of suspension shall be ten years from the date of this Resolution or such shorter period as the States may at any future time by resolution determine;
3. direct the Committee *for the* Environment & Infrastructure to arrange for implementation of a maintenance schedule as proposed in Recital 6; and
4. in the event of a failure of the wall, resulting in the ingress of the sea onto the common, to direct the Committee *for the* Environment & Infrastructure to revert to the States with proposals for minimising any damage to the common, which may include a proposal for managed re-alignment in accordance with the Resolution of the States of 29<sup>th</sup> September 2017 referred to in Recital 1.

These matters relate to policy areas which rest within the mandates of the Committee *for the Environment & Infrastructure* and the Committee *for Education, Sport & Culture* and in accordance with Rule 28(2)(b) of the Rules of Procedure of the States of Deliberation and their Committees, the Policy & Resource Committee has consulted with these Committees.

The Policy & Resources Committee has also consulted with the Development & Planning Authority as a planning application may be required for the maintenance schedule as set out in Proposition 3.

For good order it should be on record that as Requérants, Deputy Brouard and Deputy Stephens recused themselves from all matters relating to the Committee's consideration of the Requête.

The Policy & Resources Committee is conscious that in September 2017, after consideration of a policy letter from the Committee *for the Environment & Infrastructure* – P.2017/77 - Proposals for the partial removal of the anti-tank wall in the eastern part of Pembroke Bay (L'Ancrese East) and the managed re-alignment of the coastline in this area<sup>1</sup>, the States of Deliberation resolved to:

1. endorse the proposal to implement the managed re-alignment ("Option 7b") of the coastline at L'Ancrese East as set out in Section 7 of this Policy Letter and described in Section 6, Volume 1 of the report "Guernsey Coastal Defences" prepared by Royal Haskoning Dhv;
2. note that the Committee *for the Environment & Infrastructure* does not have a mandate for the provision of facilities; and
3. agree that the preferred option for the provision of facilities at L'Ancrese East, including the approval of extra funds if necessary, is as detailed in Section 9 of this Policy Letter:  
Option (e) – Remove the toilets and kiosk and replace by a public/private partnership.<sup>2</sup>

The 2017 policy letter provided a detailed and costed analysis of a number of options for the management of the coastal infrastructure at Pembroke Bay. It was supported by independent and objective expert advice from consultants Royal Haskoning Dhv, an international engineering and project management consultancy in sustainable development and innovation established nearly 140 years ago.

There are some strongly held views about the best options for managing the coastline and coastal defences in the area, including concerns about the impact on L'Ancrese Common through the managed realignment of the area (Option 7b), if sections of the anti-tank wall are removed. However, as highlighted in the letter of comment from the Committee *for the Environment & Infrastructure*, if supported, the Requête will

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<sup>1</sup> <https://www.gov.gg/CHttpHandler.ashx?id=109342&p=0>

<sup>2</sup> <https://www.gov.gg/CHttpHandler.ashx?id=110269&p=0>

substantially increase the maintenance costs without any identification of the benefits of this approach over that approved by the States in September 2017.

The Policy & Resources Committee recommends that the States of Guernsey should adhere to their original decision. This has again been validated in the appended letter of comment from the Committee *for the* Environment & Infrastructure, mandated to advise the States on such matters.

The States have previously made an evidence-based decision drawing on highly regarded expert advice they have commissioned and there has been no material change since then to require the decision to be reconsidered. The Requête should not be supported because if approved it will see the States taking a high risk approach to the management of this area of Guernsey's coastline and one which could prove extremely costly for Guernsey, both in terms of repair costs and management of the adjoining areas of L'Ancrese Common.

The Policy & Resources Committee thanks the committees of the States for their policy advice.

Yours faithfully

A handwritten signature in black ink, appearing to be 'G St Pier', written in a cursive style.

**Deputy G St Pier**  
President  
Policy & Resources Committee

Enclosed consultation responses:

- The Committee *for the* Environment & Infrastructure;
- The Committee *for* Education, Sport & Culture; and
- The Development & Planning Authority.



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20 December 2019

Dear Deputy St Pier

**Requête – P.2019/143 - Suspension of carrying out of works further to proposals for the partial removal of the anti-tank wall in the eastern part of Pembroke Bay (L'Ancrese East) and the managed re-alignment of the coastline in that area**

Thank you for your letter dated 29 November 2019 seeking the Committee's comments on the above Requête.

If approved, the Requête will increase the cost of maintaining the wall for no discernible benefit.

The States of Guernsey have agreed that 'Long-Term Infrastructure Investment' is one of its priorities and as part of this it has been stated that the States will "establish infrastructure principles managing transition, decommissioning and obsolete infrastructure". The Committee is working to deliver that objective and has worked closely with officers at Policy and Resources to create a coastal management capital policy document. The Requête contradicts this agreed priority and negates the work with officers.

The Requête asks for a suspension of the States-approved policy for an undefined period ("*a period of at least 10 years*"). It does not, at any point, outline the benefits of this suspension, nor does it suggest adopting an alternative policy to that which has already been agreed.

The Committee's approach, in line with States policy decisions, is to proactively manage the coastline so as to avoid an unplanned failure (whether a single failure or multiple failures) of the anti-tank wall. The approach proposed in the Requête is to wait for an unplanned failure or failures and then manage the resultant situation reactively, potentially through effectively reinstating the current policy. However, the current policy is a proactive measure designed around the coastline and the wall in its current state; an unplanned failure would result in an unmanaged situation that would need to be assessed and designed for accordingly.

The Requête suggests that not spending money is prudent. However, whilst the Requête suggests that (undefined) remedial works may cost less than £300,000, the reality is that a minimum of £1,650,000 would need to be spent over the next decade. This is a combination of a minimum of £550,000 on essential maintenance and management of unplanned

failures over a decade plus £1,100,000 to deliver a long term solution at the end of the 10 years. These figures do not include inflation over a 10 year period.

In practical reality the costs are likely to be far higher. Applying a policy of remedial and reactive work, we know, can result in five to 10 times more expenditure than planned preventative works based on previous experience.

For example, a small breach in a coastal wall at Vazon cost £175,000 to repair: five times what it would have cost to have carried out the required maintenance that would have prevented the breach from occurring in the first place. Similarly, the cost for reactive works following a 35sqm breach in the wall at Perelle cost £415,000, which is 10 times more than the average cost of planned maintenance for a wall of similar size to the breached area. This particular breach (which occurred because it wasn't proactively managed) nearly caused significant damage to all utilities (high voltage cables powering pumping stations, low voltage network, mains sewers and telecommunications network). The subsequent remedial work involved road closure, traffic management for 8 months and was a complex repair. The consequences of applying a policy of repair after a breach are farther reaching than simply increased cost.

In comparison, planned maintenance at Bulwer Avenue for an area of 765sqm – over 20 times the size of Perelle or Vazon – cost £348,000.

The additional expense stems from repeated mobilisation of equipment and resources, increased use of materials, increased labour costs and more extensive works completed in a disjointed manner. At L'Ancrese, repairs are more costly than in other locations because the poor condition of the wall means that heavy machinery cannot be used in places behind the structure. In addition, a repair would only address a limited area and further collapses could occur incurring additional expense.

In the event there is a major collapse of the anti-tank wall at L'Ancrese, the area would need to be stabilised before a major repair could be undertaken. In such an event, costs could escalate to between £5,500,000 and £11,000,000. Whilst the Committee would expect an intervention to be made ahead of such an event, it is important to highlight the potential for this significant financial risk.

Put simply, the approach proposed by the Requête would cost £550,000 in the best case scenario (not including the cost of the long term solution) and £11,000,000 in the worst case scenario. The realistic scenario, should the Requête be successful, is somewhere in the middle. However, even then the costs run a significant risk of being higher than the £1,100,000 if the work is undertaken now.

The knowledge gained by the States on these previous projects is why the Committee is recommending that work is undertaken now and that the States do not gamble on there being no major collapses in the period of this proposed policy suspension.

Patching up an obsolete piece of wartime temporary infrastructure for another decade with no planned solution is not the best use of public funds. This Requête could see the States having spent millions of pounds on this issue by the 2030s.

The underlying problem will still exist and a coastal defence solution will still be required for L'Ancrese East. However, as the wall will have deteriorated further, with additional sections requiring attention, the cost will be much greater than the proposed solution set out in the Requête.

In addition to the flawed logic of the proposed approach in the Requête and the likelihood of significant costs, the solution proposed in the Requête will result in farther reaching

consequences which are important to note. It is proposed by the Requêrants that money is taken from the Property Minor Capital allocation to pay for remedial works. This expenditure will not have been prioritised by the Property Minor Capital oversight board and so other projects will need to be postponed to allow for this expenditure. It is unlikely that other Committees would want projects they have prioritised to be postponed. This Requête could result in no work being done on the wall in some years, or taking away resource from other much needed projects. There were also many more projects proposed for 2020 than there were available funds, so this Requête would most likely cause a further increase in the backlog of maintenance projects that need to be delivered.

Guernsey's major infrastructure needs a long-term strategy and the Committee is focussed on delivering this in accordance with its mandate. Over the last 30 years, Guernsey has seen many delays in making decisions on infrastructure. These have been driven in part by short term considerations, and the lack of a joined-up approach. The result has been a lack of investment and subsequently an increased cost in addressing issues when they become urgent such as the Belle Greve outfall. The same was true of the road network which now requires an extra million pounds a year of investment because of the lack of investment in the past. The Committee is keen to ensure that the States do not fall into the costly trap of short-term thinking again in respect of the anti-tank wall.

The States agreed to a solution for the failing wall at L'Ancrese East in 2017 that was in keeping with the policy for coastal defence. Should the States make a decision that is contrary to its own policy it would not demonstrate good governance. If there is a view that the policy is wrong, then it should be recommended that the policy be revisited. A joined up policy is far more prudent and cost-effective than the short-sighted approach of suggesting isolated solutions (do nothing in this case) that then end up contradicting existing policy and requiring retrospective adjustments. This is bottom-up policy making.

The Committee has provided a detailed response to the Requête, broken down by paragraph, below.

- Paragraphs 1 & 2
  - The Committee believes these are a correct representations of the proposal as approved by the States on the 29 September 2017.
- Paragraph 3
  - The Committee agree that it is correct that the submission to planning was submitted on the 6 November 2018, with a digital submission on provided on the 7<sup>th</sup> as requested, however this followed a prior submission for EIA Screening, and the scope of the required EIA was issued to the Committee on the 31<sup>st</sup> May 2019.
  - The Committee wish to advise that Officers were in the progress of going out to tender on the Environmental Impact Assessment following work to understand the time implication of the EIA – however this has been halted pending the outcome of the Requête. The aim is to deliver the EIA by the end of summer 2020, given the ecological surveys that will be required.
- Paragraph 4
  - The Committee agree it is correct that the wall will decline if no work is undertaken, however the Committee would like to point out that maintaining the wall will require a significant volume of rock armour being placed onto the beach, thereby reducing the useable area at the top of the beach. The removal of the wall would, in contrast, increase the useable area at the top of the beach making it warmer and drier.

- Removal of this wall section would enable the sand dune system to be regained and support greater biodiversity including the creation of an Open Dune habitat. This is one of Guernsey's rarest habitats, classified as 'Critically Endangered' (2018 Phase 1 Habitat Survey) and its establishment would increase the value of the SSS.
- The Petitioners refer to a "...*pristine beach area...*", however the Committee would suggest that the last time the beach was pristine was in the 1930s prior to the construction of the anti-tank wall. The Committee is therefore of the view that the proposal would be significantly less visually attractive than the removal of the wall given the removal of concrete and placing of rock in keeping with the surrounding environment as would be delivered by managed realignment of the bay.
- The Committee has previously laid out independent expert opinion that the realignment of the bay will occur within predicted bands of uncertainty, and have at no time been presented with information that would suggest otherwise. Therefore, the statement "*there are substantial risks that the envisaged realignment of a bay within a bay may not occur*" appears to be pure conjecture and not based on information that has been shared either within the States or publically and subject to scrutiny, as the work provided by the Committee has.
- Paragraph 5
  - The Committee question what the purpose of a 10 year, or more, delay would achieve, other than increase costs through additional maintenance and inflation and to reduce visitor amenity through the introduction of additional rock armour. The Committee is concerned that the proposal does not outline the anticipated merits of a suspension of at least 10 years.
- Paragraph 6
  - The Committee agrees that, should the realignment be suspended, then maintenance of the wall will be required so that as far as is reasonable within the resources available that there would not be a failure over the period of at least 10 years.
  - The Committee also agrees that the likely process would involve concrete infilling and the placement of increasing amounts of rock armour onto the beach to provide additional protection to the toe of the wall.
  - The Committee has previously stated that the works at panels 4 and 5 cost approximately £100,000, however this was an interim solution to protect the retained panels from further short term degradation. It is envisaged that additional work may be required at panels 4 and 5 to ensure the interim solution provides the necessary protection over the extended timeframe of the moratorium, plus any additional time as is required following the moratorium to deliver the realignment.
  - The Committee would like to clarify that, although no design work has been undertaken on the potential additional work required at panels 4 and 5, it could require a greater build-up of the rock armour in general, not just at the toe of the wall.
  - The Committee would like to clarify that 11 of the 23 panels (not "*panel 11*") have been graded as at risk of failure over the next 5 years, so all of these would require addressing within the moratorium timeframe. The Committee would therefore advise that, as the works for panels 4/5 covered 2 panels,

the cost equates to approximately £50,000 per panel which giving a minimum cost estimate of £550,000 for 11 panels. However, this is likely to increase if a piecemeal approach is adopted with multiple mobilisations of a contractor to site. Additionally costs would increase over the time period and there is no allowance for design and management costs for any proposed repairs. As repairs to a panel are unlikely to be just for the 12 m width of a panel, it can be expected that rock armour is extended by approximately 3 metres onto each of the adjacent panels. This additional 50% would lead to a cost of £75,000 per panel and a total for 11 panels of £825,000.

- Using the assumption that the cost would be similar to that of recent work this would equate to £1,100,000 over the 10 year period.
- The Committee therefore greatly concerned that setting aside £200,000 for ongoing maintenance at the site would fall significantly short of what would be required.
- The Committee agree that the rock armour can be incorporated into the realignment project, however the piecemeal approach and required multiple handling of the rock generates additional cost.
- The Committee wish to advise that the Requête refers to “...new heavier rock armour...” which is not correct, the rock armour for future repairs would be the same as that used at panels 4 and 5 as 4 tonne is the limit for local plant.
- Paragraph 7
  - The Committee agrees that a no maintenance approach carries significant risks.
  - The Committee disagrees that it would be preferable given the potential for significant incursion into the common should the wall fail in an uncontrolled manner.
  - The Committee considers that an unplanned breach of the wall due to sudden failure, particularly during storm conditions, could place considerable strain on the Island’s resources. In the event that key areas of harbours or east coast coastal defences were damaged at the same time then the resources of States Engineers and contractors may mean that it would not be possible to prioritise work to stem a breach at L’Ancrese.
- Paragraph 8
  - The Committee are not clear whether this would require the States to vote on the reversion to managed realignment against any other approach, or if other approaches should be explored during the debate. If the latter, the Committee seek clarity on who would be responsible for considering, developing and presenting options?
  - The Committee would advise that if there is a failure of the wall resulting in damaging ingress of the sea then immediate emergency works will be required to secure the damaged area and prevent further ingress / erosion.
  - The committee would further advise that, as has been proven elsewhere around the coast, emergency work is invariably less cost effective than planned work and the approach will have to be reactive rather than proactive (planned).
- Paragraph 9
  - The Committee has no comment.



- Resolution 1
  - The Committee have suspended work on the Environmental Impact Assessment in order to not be in conflict should the Requête prove successful.
  - The Committee would like to make clear that this resolution will lead to a further period of delay to enacting managed realignment following the end of the moratorium.
- Resolution 2
  - The Committee does not understand what the purpose of a 10 year delay on delivering the project aims to achieve, other than increased cost and risk.
  - The Committee wish to make clear that the resolutions do **not** outline a return to managed realignment at the end of the 10 year period – there is no proposal for what happens at such time.
- Resolution 3
  - The Committee, as advised above, would outline that the proposal in recital 6 appears to be significantly under what is expected to be required over a 10 year period.
- Resolution 4
  - The Committee would caution that resolution 4, as worded, could prevent the Committee taking immediate remedial action to minimise incursion into the common should a panel, or panels, of wall fail.

The Committee trusts that the above clearly outlines the issues that the Requête would create, if successful, most notably that there is a significant investment required over an undefined period for no identified benefit.

The Committee therefore does not see what the reason for the proposal contained within the Requête is – especially given that the Requête does not direct any investigation into long term solutions.

Yours sincerely



**Deputy Barry Brehaut**

President

Committee *for the* Environment & Infrastructure President

The President  
Policy & Resources Committee  
Sir Charles Frossard House  
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23 December 2019

Dear Deputy St Pier

**Requête – Suspension of works re the partial removal of anti-tank wall at L’Ancresse east**

Thank you for your letter dated 29<sup>th</sup> November, inviting comments on the above Requête. This matter was discussed by my Committee at its meeting on 18<sup>th</sup> December.

It is acknowledged that when considering the Requête the States will want to take into account a range of factors including: capital and ongoing revenue costs and value for money; the amenity value of the beach and surrounding area; and the safety of beach users. This will help to determine whether there is sufficient weight of evidence to support approving the Requête and a significant change of policy.

It has already been necessary to carry out extensive repairs to a number of the wall’s panels, and other panels are now failing. Therefore, the States will also want to be mindful of the risks to beachgoers and costal walkers that might arise if, as set out in the Requête, the wall is left to decay in an unmanaged way, intervening only “in the event of the failure of the wall, resulting in the ingress of sea onto the common”.

The comments below are restricted to the areas covered by the Committee’s mandate - inter alia, advising the States on matters related to sport and heritage.

## **Sport**

It is noted that the wall is in close proximity to the golf course. The professional advice previously provided to the States acknowledged that the removal of the wall is not expected to result in the beach encroaching on to the course. However, clearly the removal of the wall is likely to result in the beach moving closer to the 15<sup>th</sup> tee.

In the event that it became necessary to mitigate any risk to beachgoers by realigning the 15<sup>th</sup> tee, or the 15<sup>th</sup> hole, the current projections for realignment of the coastline, as advised by Royal Haskoning DHV, suggest that such works are unlikely to be substantial. It should be noted that the risks associated with playing golf in such close proximity to beachgoers already exist, for example as a result of the second hole's proximity to Ladies' Bay.

## **Heritage**

The wall is one of several fortifications around the Island which are considered to be of historical importance and special architectural interest as an example of German military design. The extant Resolution provides for most of the wall to remain intact. The objective of the extant Resolution for managed realignment is that, in time, the area would revert to its more natural original state. It could be argued that this would be more in keeping with the long-term heritage of this part of the Island's coastline. Thus what constitutes 'heritage' in this context is subjective.

However, if the long-term preservation of the wall for heritage purposes is to be afforded priority over all other considerations, which is not what my Committee is advising, it is worth noting that neither the approach of recent years, nor the extant Resolution for a managed realignment, nor the prayer of the Requête are designed to achieve that aim.

I trust that the above will be of assistance to you.

Yours sincerely



**Deputy Matt Fallaize**

President

The Committee *for*

Education, Sport & Culture



Development &  
Planning Authority

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The President  
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24 December 2019

Dear Deputy St Pier,

**Requête – P.2019/143**

**Suspension of carrying out of works further to proposals for the partial removal of the anti-tank wall in the eastern part of Pembroke Bay (L'Ancrese East) and the managed re-alignment of the coastline in that area**

In light of the propriety issues surrounding consideration of the current planning application for removal of a section of the anti-tank wall and installation of rock armour structures, the Development & Planning Authority does not wish to make any comment on the Requete.

Yours sincerely

**Deputy Dawn Tindall**  
President, Development & Planning Authority