

# THE ALDE & ORE ASSOCIATION

*Maintain our Coast and River Defences*



## Appendix I

### **Alde and Ore Futures - Managing the Coastal Environment Alde and Ore Association responses to the questionnaire**

**Questions 1-7** are for individuals to respond but the Alde and Ore Association with almost 2000 members exists to ensure the interests of the Alde and Ore estuary are taken into account for the well being of the area and its many visitors.

**Question 8** The Association does not feel confident about the information on managing the estuary and sea walls.

**Question 9** **If no, what additional information that you would like on the Alde and Ore Futures approach?**

**1. There is insufficient clarity about assumptions to enable the community to reach reasoned decisions about the options**

Transparency and auditability is lacking in the A&O Futures and Halcrow reports. There is little, if any, explanation or justification of the assumptions made in preparing their reports e.g. there is no justification why the risk to life is negligible, there is no justification given for the very short residual times given for many of the flood compartments or, indeed, there is no evidence given to support assumptions about the standard of protection needed.

The appendices on flood compartments can only be taken as illustrative. They do not provide a factual basis for the way forward, nor can the conclusions drawn from them be accepted, as so many of the assumptions underlying the assessments are neither explained nor justified and the analysis of relevant factors such as impact on the estuary as a whole is incomplete.

It is not clear how the past assessments of the shoreline management plan and other consultants' reports and the work on the Estuary have been combined into this report.

**2. Information is needed on the costings used on work on defences**

There is no information on or explanation of the costs relating to repair, maintenance or renewal of defences which appear significantly overestimated by assuming the most expensive working practices in particular in the costs of repairing any breach – the use of helicopters to repair breaches has been assumed when, apart from possibly using helicopters to stop gap a breach, ordinary excavators should be able to do most or all of the work. The use of locally-sourced (and therefore much more economic) materials has been ignored even though the walls were all originally built with locally-sourced materials.

Further, the Futures Report highlights two local initiatives to repair the estuary walls. What has not been taken into the flood compartment costings is this valuable local experience, not only in cooperation, but in new techniques, with lower costs, effort and appropriate local applicability, into future planning of defence work. Clearly there will need to be fresh assessments in the light of the outcome of these and other projects, as well as more realistic and locally informed costings generally.

**3. Explanations for the assumptions of time to failure of defences**

No justification is given for the pessimistic assumptions that many of the defences will fail in the next 2-5 years, possibly 20 years in some cases. Such assumptions result in exaggeration of

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the costs of doing something sensible as it is assumed action needs to be undertaken in the near rather than medium term future. Given that the river defences have been built over centuries mostly with locally sourced materials and have withstood many storm surges and sea level rise without any breach for the past 58 years (and successfully withstood the 2007 over topplings), the general argument that radical changes are needed now is self-evidentially overstated.

Further, the Association has been under the impression that it was now generally accepted that the threat to the area was not sea level rise but breaches made in inadequately maintained river defences by sea surges, and that while overtopping is considered a possibility it is not one likely to cause overwhelming or permanent damage where walls are properly maintained. This again points to the need for realistic costings looking at what is likely to happen over the next 25 years.

#### **4. Inadequate estimates for damage to aquifers**

The impact of flooding on agricultural jobs is not mentioned particularly in areas such as Orford. The national economic importance of protecting land which is currently used to produce significant quantities of potatoes and other crops is underestimated. The permanent damage which would be done to local aquifers, essential for agriculture in the event of any breach, is also significantly underestimated as they will be lost in perpetuity should they be polluted in event of a flood. Proper account of this possibility would affect any benefit-cost ratios of any option.

#### **5. Missing assessments of tourism, recreation and social benefits**

The report underestimates the potential damage to recreation should the defences breach. For example, there is scant recognition that a breach could lead to substantial changes in the velocity of estuary currents, as a consequence moorings and water based activities would be adversely affected. This would damage the attraction of the whole area for recreational purposes and, therefore, diminish its economy and lead to loss of income to watermen along the river. For the town of Orford who own the river bed this would be a real concern. The same can be expected at Aldeburgh with even more significant economic loss wholly unrecognised in the Futures report.

#### **6. Lack of a strategic assessment of the estuary as a whole**

The estuary is a unified and unifying feature, central to much of the economy of the Alde and Ore area but it seems no account is taken of that central value which is greater than the sum of the individual flood compartments. The report gives no sense that the Estuary has to be seen as a whole.

The flood compartment approach in the report is a useful start to building up a picture of the area but it is only the start and part of the necessary building blocks for an overall plan. In short, a strategic assessment across all flood units is needed to allow interactions between units to be considered.

So, the Report lacks an overall view and strategy for the estuary, including the interaction of the river, the flood compartments and the sea and the people that live and work there.

#### **7. No “do something simple” option is covered**

Only “no active intervention” and “do absolute minimum” options are considered – there is no consideration of a “do something sensible” option and estimate of its benefits and costs. In particular, there is no attempt made to properly assess what needs to be done to enhance the

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defences so as to avoid the cost of any breach. Nowhere are there options or clear exploration of a programme of preventative work which might cost no more, or little more, than mending a breach once it has happened. Also preventative work can be done to last a number of years whereas an emergency infill might need repairing again within in short space of time. Therefore, it might well be possible to upgrade a flood cell for the price of mending a breach.

Given that the total value of the property assets under threat is in the order of £600m more effort on a “do something sensible” option appears to be a priority. Further, to encourage local communities to engage in a partnership approach, a ‘do something sensible option’ will be the only way forward to assess whether it is economically realistic and, if it is, to secure financial contributions from all those affected.

## **8. Insufficient and confusing analysis of costs and benefits**

The Report is very disappointing in that it is offered as a basis for local communities to consider the options on river defences and reach a considered conclusion as to the costs and contributions to be made both by national funds as well as locally-contributed funds. However, there is insufficient analysis about the costs and benefits and who the beneficiaries would be for any local contributors to make any properly reasoned decision about the options open to them.

Further, the approach to estimating costs of options seems somewhat illogical. ( e.g. in Flood Compartment 4, under ‘do minimum’, mending a breach is costed at £123, 000 in two successive years, while the ‘Hold The Line’ option extending the life of a defence may cost £169, 000 and last for 20 years plus.

The material issue, namely river defences, should have been treated as a separate consultation exercise. Each of the 1600 homes, farms and businesses affected should have been sent a clear and concise explanatory note which makes clear their rather dire prospects under your proposals including deliberately flooding them without compensation. Only then could there be a more informed conversation.

## **Question 10. Would you like to be involved in the maintenance of sea and estuary walls near you?**

The Alde and Ore Association is more than ready to assist in the future strategy for maintaining the sea and estuary walls. The following paragraphs responding to Questions 11, 12, and 13, are just illustrations of the sort of approaches which may be adopted. Others can be developed as the framework document and strategy begins to develop.

## **Question 11 If so how?**

Governance arrangements will be key to realistic implementation. The Website of the Futures project states that after the conversation, the framework document will be developed and include structures for actions to be taken by individuals, communities, local authorities and other government bodies. The Report however is offered without in any way addressing the issues of governance, that is to say, who will make decisions involving the local communities and who will be making arrangements for work to be carried out to ensure the walls will continue to provide a consistent level of security. This will require further discussion. For example, there are 40 front line landowners within the estuary but there is no guarantee that

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the work undertaken by one will not undermine the work done by another. Until there is robust machinery in place to ensure coherence and enforcement the hopes for greater localised contributions must be unrealistic. Linked to this, is the issue of where the final decision lies on works to be done at a local level. A community may have as strong, or stronger, interest in the continuation of river walls as a landowner, and therefore may be willing to contribute.

There are 1600 homes behind the front line landowners who are dependent on what the front-line owners do or fail to do and it is remarkable that their vulnerability to the acts and omissions of the front-line landowners is neither addressed in any way nor even mentioned which we find extremely disturbing for a quasi official government report. Equally there are many businesses dependent upon the estuary as it exists now and the report appears to take no account of the impact of substantial changes in the river resulting in the loss of businesses and visitors on the economy of the Alde and Ore area.

Another example is that if Flood Compartment 10S were to be abandoned and flooded, the river would become practically useless for sailing and other activities, so lead to the failure of the significant businesses in the local economy associated with it, and residential and retail businesses. Such a decision cannot be left to the landowner alone as the Conversation Document suggests.

First, however it will be necessary to develop a plan and strategy for the estuary as a whole, at which point it will then be possible to assess the best governance approach. Some pointers to bear in mind are that there would be concerns about a blanket approach to delegation of all activity to the most local people involved because the future for the estuary must lie in it being treated as whole not small segments.

**Question 12. The Environment Agency plan has identified the current maintenance plan for the estuary over the next year. Do you think there are any areas of greater priority for repairs? If so, please state where?**

It would appear that over half of the maintenance costs relate to mowing. The sums are considerable. Experts advise that mowing is helpful but need not be that frequent. More thought needs to be given to the balance of expenditure on simple ground clearing and on repairing or restoring small tracts before repairs require very heavy work and expenditure.

Secondly, the River Defence Committee of the Alde and Ore Association provide an annual, more frequent if needed, survey of the state of the river walls. This needs to be acted upon in future.

Third, why is there no clear assessment of the overall state of the walls and what might be done to increase the length of life for example where walls are steep, narrow or sinking? The Association understand such a survey could easily and not expensively be made and that could then provide a basis for a rolling programme rather than piecemeal and changing approach which appears to be happening at present.

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**Question 13. In the longer term (more than 20 years) we may need to find new ways to protect communities from the risk of flooding. Do you have any suggestions as to how this might be achieved?**

There are several positive actions to consider including:

- i. Assess all aspects of local defence repair projects in all the Suffolk Estuaries and ensure that the latest techniques and most cost efficient methods are used in any repair and maintenance programme
- ii. Develop a repair strategy for the estuary rather than addressing repairs piecemeal with a view to rolling out a plan to seek to secure longer life for all banks
- iii. Assess which parts of the banks are beginning to show signs of weakness and develop plans involving those with an interest in the repairs to ensure early timely preventative action.
- iv. Take forward the Government's policy for sharing defence work by including in the discussions and plans on governance how best to ensure that the necessary expertise in defence work, in handling legislative obligations, and carrying out the work can be knitted together, so that all stakeholders ranging from government to landowners to the local community
- v. An assessment is required for a governance policy and framework for facilitation of repairs **before** minor problems lead to threatened breaches to include both funding and expertise.

In conclusion, therefore, significant work needs to be done to prepare properly worked out plans on properly justified assumptions for each community and a strategy that encompasses the estuary as a whole. In particular we need to see a costed "do something sensible" plan as at present there is no proper benchmark on which to assess the various options. The Alde and Ore Association is ready to assist with this.

Stewart Ashurst  
**Chairman**  
**Alde and Ore Association**