

THE ALDE & ORE ASSOCIATION

Your Voice – Your Estuary



CONSULTATION ON THE DRAFT FLOOD AND COASTAL EROSION RISK MANAGEMENT STRATEGY. JULY 2019.

RESPONSE BY THE ALDE AND ORE ASSOCIATION

The Alde and Ore Association with some 2000 members. (Registered Charity No. 1154583). Its charitable objectives are to preserve for the public benefit the Alde, Ore and Butley Creek rivers and their banks from Shingle Street to their tidal limits and such of the land adjoining them or upstream as may be considered to affect them, together with the features of beauty and or historic or public interest in that area.

Questions are those listed in the EA document 'Consultation questions'.

Question 1. To what extent do you agree with the vision: a nation ready for, and resilient to, flooding and coastal change- today, tomorrow and to the year 2100?

1. Clearly this overarching view has to be right in principle.

Please be aware that the Alde and Ore Estuary has already sought to do this. The Estuary has a plan, endorsed by the relevant risk management authorities, to ensure that the flood defence walls of the river are resilient to be withstand overtopping by a 1:200 surge in the year 2050 taking account of sea-level rise.

The Association wrote a plan for the estuary in 2008, Framework for the Future, in which it set out the case against the then government approach to decide that given the likely sea level rise in 100 years' time any immediate action in relation to river defences was not called for. The Association pointed out that the risk of damage to the local economy and environment in the next 25 or even 50 years was not sea level rise but breaches of inadequately maintained river defences. That basic approach has now been included in the local community estuary partnership plan.

The Association therefore suggests that the Alde and Ore Estuary Plan should be used as one of the examples to follow as a positive way forward to achieving an effective flood and coastal erosion strategy.

Question 2. To what extent do you agree with the Environment Agency's proposed strategic overview role as set out in the chapter 'setting the context for the draft strategy'

1. The Association supports the approach to resilience and adaptation but suggests that while the document provides details on processes towards achieving the Ambitions, and while Measures, meaning steps or action not quantification, are suggested there is insufficient attention to outputs and assessing how successful the policy is towards achieving them.

2. The proposal for greater co-ordination of the work among all risk management authorities , rather

The Association, a Charitable Incorporated Organisation, exists to preserve for the public benefit the Alde, Ore and Butley rivers and their banks from Shingle Street to their tidal limits and such of the land adjoining them or upstream as may be considered to affect them, together with the features of beauty and or historic or public interest in that area.

THE ALDE & ORE ASSOCIATION

Your Voice – Your Estuary



than each following their own direct concerns has to be right, as so many services impact on each other and on the health of the communities they serve.

3. Putting people at the heart of decisions and taking account of local knowledge and priorities is a good approach.

Questions 3 a and b.- Strategic Objective 1.1 (nation to be resilient to future flood and coastal risks) and related measures

1. In working to identify the concept of standards for flood and coastal resilience, please look at existing examples and projects and build on the work already done. Do not dismiss ideas from abroad as they might translate well here, such as a shingle engine, or innovative wall construction and strengthening. Also please work on the basis that pilots can be used to test ideas.
2. Any concept needs to be framed taking account of the fact that changes occur over a long period of time, albeit with sudden large changes in extreme climate or weather occurrences. A phased approach looking over the short, medium and long term is needed.

Questions 4 a and b.- Strategic Objective 1.2 (RMAs helping place plan for change) and related measures

1. The Association agrees that the risk management authorities should help places plan and adapt to change. It notes that this has worked very well in the Alde and Ore Estuary over the last 5 years. While community groups can identify their local priorities and have huge background knowledge to ensure that local plans are well based with substantial evidence, never the less, the local experience is that statutory and similar requirements including regulations such as the Habitats Directive, the need for very specific strategic environmental assessments, the need to know and understand the complex funding criteria and business assessments has shown that without the assistance of the key RMAs, it would be very difficult for local communities to make progress. Conversely, if local communities are not involved in local plans, factual mistakes, creating hostility, are all too easily made. All this requires very good communication with all the interested groups.
2. There is a further consideration. Plans take years, not months, to develop as they have to go through so many hoops including expert reports and advice, statutory assessments in relation to environment and other matters and rounds of proper consultation. The Alde and Ore Estuary Plan has taken the community some 5 years to get a resilient plan into place, compatible with planning and environmental requirements, and will take 7-10 years to implement because of the limitations of working with the seasons and retaining biodiversity.

THE ALDE & ORE ASSOCIATION

Your Voice – Your Estuary



Questions 5a and b. Strategic Objective 1.3 (those involved in managing water to embrace and embed adaptive approaches) and related measures

The approach suggested for RMAs applies equally to those involved in water management, they are part of the integral whole of managing flood and coastal erosion risk.

Questions 6 a and b. Strategic Objective 1.4 enhance natural , built and historic environments, leave things in a better state for the next generation

Clearly this objective has to be right.

Note that built environments will include historic flood defences, often built of clay and blending with the landscape.

Questions 7a and b- Strategic Objective 1.5 (funding sources to invest in resilience) and related measures

1. It is not clear why this refers only to new funding sources. Additional resources are needed in that the document points to a need for expenditure of £1 billion a year while expenditure in the last few years has been a welcome but insufficient £2.6 billion.
2. New funding should embrace all beneficiaries- for example in an area with a large tourist population bedroom taxes such as are used in Venice and other places of interest are collected so that the environment valued and appreciated by visitors obtain revenue from the visitors directly themselves.
3. Any organisation or business investing in an area, adding to the infrastructure or the load on the infrastructure should play a realistic contribution either initially or a regular contribution over time.
4. In relation to far-sighted plans already in the pipeline, these should not be left out side any future funding strategy. Such local far sighted plans should continue to be eligible for their share of funding as well as new community provision. They can also be valuable pilots for other areas.

THE ALDE & ORE ASSOCIATION

Your Voice – Your Estuary



5. Government money is needed to support innovative approaches to flood risk and coastal erosion, such as a shingle or sand engine as well as the traditional methods such as groynes, or the well tried and tested clay walls as we have had around the estuary for centuries.

Questions 8 a and b- Strategic Objective 2.1 (new development to contribute to place based resilience) and related measures

With climate change and rising sea levels, new resilient designs will need to be built into existing housing as well as new developments.

Questions 9a and b- Strategic Objective 2.2 (new development to support environmental net gain)

This might sound correct but there needs to be a balance between needs of local/people/economy and biodiversity: absolute environmental net gain is too inflexible.

Questions 10a and b Strategic Objective 2.3 (contribution to local economic regeneration and sustainable growth from investments in change projects) and measures

As understood by our local community, the Treasury criteria for grant aid do not give adequate weight to the value of an entire economy to a local area (supporting only houses but not valuing and so losing businesses providing employment does not seem logical). Nor, as yet, would it appear that sufficient value is set on natural capital as an element to be considered in any developments.

Question 12a and b Strategic Objective 2.5-(infrastructure owners' responsibilities in supporting resilient structured) and related measures

We agree that building and maintaining flooding and coastal infrastructure to keep pace with climate change is critical to future resilience. This had been going on in the Alde and Ore Estuary since the first walls were built in 1168. The latest plan for enhancing the walls, as successive generations have done over the centuries, has built in an allowance for sea level rise and designed a more resilient conformation for the walls so that overtopping rather than breaching occurs and recovery is very quick once the water is removed via planned for sluices.

THE ALDE & ORE ASSOCIATION

Your Voice – Your Estuary



The Association fully supports best practice on local flood infrastructure management and record keeping, particularly the location of sluices and channels for taking away floodwater rapidly.

Questions 13a and b Strategic Objective 2.6 (working with infrastructure owners to ensure infrastructure development is resilient) and relate measures

This sounds a good approach. Locally we have the impression that infrastructure bodies tend to work in isolation and be unaware that an area liable to flooding needs all those likely to be affected to work together and this includes contributions in cash and in kind not just relying on local authorities to provide the infrastructure.

Questions 14 a and b Strategic Objective 3.1 (young people understanding the impact of flooding and coastal change)

It is a matter of concern that locally there is a great unawareness of the need to protect and maintain flood defences and an assumption that their existence will simply carry on without any stewardship. The Association therefore supports greater learning, within the classroom or in the field to achieve greater understanding.

Questions 15a and b –Strategic Objective 3.2

1. The Strategic Objective should read “Between now and 2030 people will understand the potential **risk** and impact of flooding and coastal change on them and take action.” i.e. insert the word ‘risk’.
2. Considerable effort is needed to communicate the risk of flooding and to get people to act. It often takes an actual event to make a community realise bad events can happen to them, that action is needed to make flood or erosion response plans and to take mitigating physical construction and changes to help reduce the adverse impact of such future events. The RMAs need to respond immediately after any such event, first with help and very shortly afterwards with assistance to help the local community make plans against future occurrences.

Questions 16a and b -Strategic Objective 3.3

Why is the impression given in the wording of this objective that the level of support for response and recovery from flooding and coastal change is limited to the period 2030? Better to be clear as in ‘By 2030

THE ALDE & ORE ASSOCIATION

Your Voice – Your Estuary



steps will have been taken so that people will thereafter receive a consistent and coordinated level of support’.

Question 18: other comments

We would like to express appreciation of the significant changes made over recent years in flood warnings by the Environment Agency, in particular our local East Anglian group, and the effort put into making sure people know what is happening and can take precautionary action. Further steps to ensure continuing community engagement and involvement in such actions and ensuring as many people are aware as possible of the risks and impacts of flooding should be on a continuing agenda for action.

Alde and Ore Association

3 July 2019

Contact: Chairman Alison Andrews

aldeblackburn@aol.com

19 Lee Road, Aldeburgh, Suffolk

IP15 5HG Telephone 01728 452660