

27 October 2008

DEFRA
Nobel House
17 Smith Square
London
SW1P 3JR

Dear Sirs,

DEFRA – Consultation on Defra policy statement on appraisal for flood and coastal erosion risk management.

1. The Suffolk Preservation Society (the Society) submits the following observations in response to Defra's invitation for comments on the above document. The Society has 1800 members, drawn from all corners of Suffolk. In addition one third of all town and parish councils in the county as well as 54 amenity societies are members of the Society.
2. Suffolk has both a coastline and estuaries of great beauty and importance but which are likely to suffer adversely from flooding, the impacts of climate change, and from managed retreat. This reply is based on our detailed knowledge of the area and our recent work, with other CPRE County Branches and the East of England Regional Office of CPRE, to secure a more co-ordinated and holistic approach to dealing with the problems of the coast and estuaries of the area.
3. For convenience the Society has divided its response into two main sections, the first dealing with some general, but critically important comments and secondly, with detailed comments regarding the text of the consultation document.

General Comments

4. The Society notes that in the second paragraph under heading 1.2 on page 15 and again at the top of page 23 the Government's overall aim of all flood and coastal erosion risk management is quoted. It states the aim is one of reducing the threat to people and their property and also "*deliver the greatest... .. Government's sustainable development principles*". The Society suggests, however, this should now include specific reference to protecting valuable agricultural land, essential infrastructure features and wildlife habitat. Such inclusions would be consistent with the Government's wider environmental obligations and commitments.

5. It is noted in the first paragraph under heading 1.1, page 15, it is stated that “*the Government promotes nationally consistent approaches to the assessment and management of these risks rather than setting national standards for protection*”. While the Society can see the benefits to Government of such an approach, the lack of any real overall policy for managing the coastline and estuaries means that decisions on their future are made purely on risk assessment basis without risk being assessed against a strategic policy. This is fundamentally wrong. It negates the role of Government, shifts responsibility for decision making effectively to the risk assessment process rather than elected individuals, or organizations.

6. Therefore risk management appraisal should not be the only determining tool for decisions on our coastline and whether people or property should be protected.

7. Generally engaging the public in such a technical assessment is difficult. It does not allow for a great deal of latitude and to reflect local circumstances etc. If the policy statement were to be adopted in anything like its current format, (which was very turgid to read and in some places understand and would not be a contender for a plain English campaign award) then a more user friendly version will be required. But this will need to be honest in making clear that risk assessment does not take sufficient account of opinions of knowledgeable local people.

8. On page 23, last paragraph, the 100 year scenario is noted. But this is surely unrealistic at present given the acute difficulty of forecasting just one variable that is the likely consequences and impacts of climate change. This is a variable which rightly is receiving much attention but while it appears there is now a widespread consensus it is happening, the rate of change and impact has many different models, views and professional opinions. Hence is it realistic to now retain the 100 year scenario?

Detailed Comments

9. Page 4 - The statement in the first bullet point in paragraph 4 is welcomed. However it was not evident in the recent Blyth Estuary study.

10. Page 7 – Paragraph 1.4 – first bullet point - The Society would suggest that in reality a long term investment strategy is difficult when so many factors are variable or unknown.

11. Page 16 – Paragraph 1.3 – It is not always possible to take or assess the long term view when we do not have the evidence or scientific basis on which to work. There are again too many unknown variables for the decision making process to have any chance of producing the right outcome.

12. Page 17 – Third paragraph - The Society questions if sufficient human resources are available for the work to be undertaken. Furthermore it is critical that staff have a detailed knowledge of the geography of the area in which they work. The employment of staff from outside the area is not, in the Society’s opinion, likely to give local communities confidence.

13. Page 17 – Paragraph 1.4 and Page 18 heading 2.1, second paragraph – Climate change and its impacts and consequences is important. But the Society suggests it is not the only important factor. There may be too much emphasis given to it and a more balanced and holistic approach needs to be adopted in the statement.

14. Page 20 – Paragraph 3.2 - The strategic approach for apportioning benefits over a period of time appears to involve a certain amount of ‘*crystal gazing*’. Is this what it is meant to read like or operate like?

15. Page 25 – Valuing the environment appears for the first time. It is very important and needs to be given far greater importance in the appraisal/risk management assessment process.

16. Page 27 - There needs to be an acceptance and acknowledgement that not all factors can be costed or are easily costed. For example what is the cost of visitor satisfaction from a coastal walk which cannot be undertaken or enjoyed any more if the coast was to be lost in total or in part?

17. Page 28 – heading 5.3, first paragraph - The Society is concerned with the blanket adoption of the “*least cost*” option. There needs to be an acceptance that this might not be the right option. Making critical decisions just on cost is a flawed way of working and will, the Society suspects, justify the ‘*do nothing*’ option. Also third parties have great difficulty in pursuing their own suggestions or ideas.

18. Page 29 – It is in the Society’s view essential that costs are made available at the same time as strategies are published.

19. Page 31 and Page 32 - As referred to in paragraph 4 above the importance of agricultural land to the country’s economy, food production and sustainable living agenda appears to be ignored. The link needs to be made that when we have coastal erosion and the loss of land, we erode the ability to become self sufficient in terms of food production. This needs to be costed and taken account in the risk assessment and not ignored as it appears to be at present.

20. Pages 33 and 34 – Critical to these pages is the valuation of land guidance which is not to hand at the time of drafting this reply. While it is noted that the existence of planning permissions and the uplift in land values associated with such permissions can be taken into account, the Society would equally argue that the contribution agricultural land can make to the economy must also be quantified.

21. Page 36 - The Society remains unconvinced that the rigorous business case criteria highlighted is correct, desirable, comprehensive or appropriate. It is certainly true that it has not appeared to be evident in recent schemes.

22. Page 37 – penultimate bullet point – What is meant by “*Government is developing new policies on to help individuals and communities adapt to these circumstances*”. The position on compensation to individuals for property or land lost remains to be clarified. Clarification is now required urgently.

23. Page 44 – The Society would like to see the same amount of care, attention and compensation given to people as afforded to wildlife under the Habitats Directive. It is inconsistent that alternative sites have to be found for displaced wildlife under a managed retreat scheme and not for people. How can this be justified? The Society suggests that the government’s position on compensation or funding to relocate needs urgent clarification.

24. Page 46 – The Strategic approach suggested is welcomed by the Society but will require a far greater co-ordination of Shoreline Management Plans and Catchment Flood Management Plans than has been evident in Suffolk to date.

25. Page 47 – The existence of different agencies and bodies to deal with or responsible to flooding is confusing. Should we not now move to having just one authority or body responsible for this issue? Such a move would, the Society is sure, be welcomed by the public.

26. Page 48 – Paragraph 3.4 – Local initiatives appear in some cases the only way forward but the Environment Agency often appears reluctant to grant permission. What should happen in these cases? Would not the suggestion in paragraph 25 above help?

27. Page 50 – Sustainability can be an argumentative point. The Society would like to see a definition of sustainability included in accordance with the following which it uses:

“Sustainable development is development that meets the needs of the present without compromising the needs of future generations to meet their own needs.”

28. Page 52 – The time frame suggested, up to 200 years is, in the Society’s view, just too long at present given variables, knowledge base and evidence.

29. Page 55 – The Society is of the opinion that the accuracy of valuations is likely to be a cause of concern and dispute. Again this highlights the significant number of variables in the process and brings into question its usefulness if such straight forward matters cannot be more accurately quantified or predicted.

30. Page 61 – The public should not be asked to participate and be consulted in the process. **They must be engaged in, be part of, and have ownership of the decision making process relating to flood and coastal erosion management.** Only in this way can any decisions made hope to have the backing of local communities. It is for this very reason that recent consultations on schemes in Suffolk have failed to gain public backing. A fundamental change is needed on this and a radically different way of taking forward schemes needs to be devised and urgently implemented. In doing so those agencies involved need to be more open and receptive to seeking and taking into account local knowledge of the way the area works etc. Often local people can add more to a scheme because of their knowledge than any sophisticated assessment or risk management assessment.

31. The Society hopes Defra finds the above comments helpful. It asks to be informed on how they are taken into account in the drafting of the final version of the statement and to receive a copy of it.

Yours sincerely

Richard Ward
Director

cc Suffolk MPs
cc All Suffolk Coastal town and parish councils
cc Chief Executives of Waveney, Suffolk Coastal, Babergh & SCC
cc CPRE Essex, Norfolk, East Yorkshire and Kent
cc Corinne Meakins
cc CPRE National Office (S Spiers)
cc PTC & Exec. Committee
cc Lowestoft, Southwold, Aldburgh and Felixstowe Societies
cc David Andren, Chairman of Alde & Ore Association
cc Media consultant