

Severn Estuary Flood Risk Management Strategy

Report on 2013
Consultation

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Introduction

This report is a summary of the 62 responses to the Environment Agency's consultation for the revised Severn Estuary Flood Risk Management Strategy 2013 (20 May - 31 July). All responses, including emails, have been incorporated into this report, which has been compiled by the Severn Estuary Partnership on behalf of the Environment Agency. The consultation material was open to general comments and did not use itemised questions that might have constrained comments. Over 1000 people accessed the consultation material on-line or received paper copies. The selection of general comments given in the next section demonstrates that the proposals and approach were received more positively than those in 2011.

The greatest proportion of responses (24%) was from local residents (14), closely followed by representatives of local interest groups and associations 21%, ie 12 responses: A summary of the sectoral distribution of responses can be found in the Appendix.

A large proportion of the responses were from Parish Councils or other local organisations that provided a consolidated response on behalf of groups of people or communities. The range and distribution of the responses are discussed as part of the report analysis. As part of this analysis key, broad themes were initially identified. Responses relating to each of these were then further investigated and divided into sub-themes. This was deemed the most appropriate method given the breadth of topics covered within the responses.

Following a brief overview of the key themes in the next section of this report, subsequent sections provide detail of the concerns raised, in relation to each of the key themes.

Some concerns and comments submitted covered issues that were outside the remit of the Strategy. These are noted at the end of the report.

General Comments

The following comments were provided by various consultees. These demonstrate a more positive overall response to the consultation and the proposals contained within it, than that held in 2011.

“... pleased to welcome and support the revised proposals which it considers to be much more appropriate than those previously advised”. The new approach ... is far more acceptable both to those communities directly affected and to individual landowners whose homes and livelihoods would have been blighted or destroyed had the 2011 proposals been ratified”.

“ welcomes the EA’s revised SEFRMS and notes that many of the concerns expressed during the previous consultation in early 2011 have been addressed.”

“... commends the EA on its revised approach to the monitoring of flood risk, the engagement process and its increased openness with regard to flood defence maintenance issues.”

“Overall we welcome the proposals, and in particular the clear commitment to working with local representatives and interest groups to develop effective responses to the challenge of rising sea levels and climate change.”

“We are also pleased that there is a better explanation of the legal drivers for habitat creation (ie the Habitats Regulations 2010).”

“... acknowledges the efforts made by the EA in re-engaging with local communities around the Estuary following the concerns raised and for their co-operation in keeping the Committee informed of progress with regular reviews”.

“That concerns expressed by to the original 2011 proposals have been taken on board in the revised proposals – overall these are far better explained and evidenced than last time.”

“We welcome the approach taken by the EA in the production of the 2013 SEFRMS and the approach taken with regard to the consultation with farmers, local communities, businesses and those with an interest in the area. The approach of seeing individuals and groups over the past two years has been such as to engender a good deal of trust and positivity. The EA staff employed to focus on this communication has definitely been helpful”.

“We welcome the adaptive nature of the strategy and the willingness of the EA to explore alternatives to hard-standing defences”.

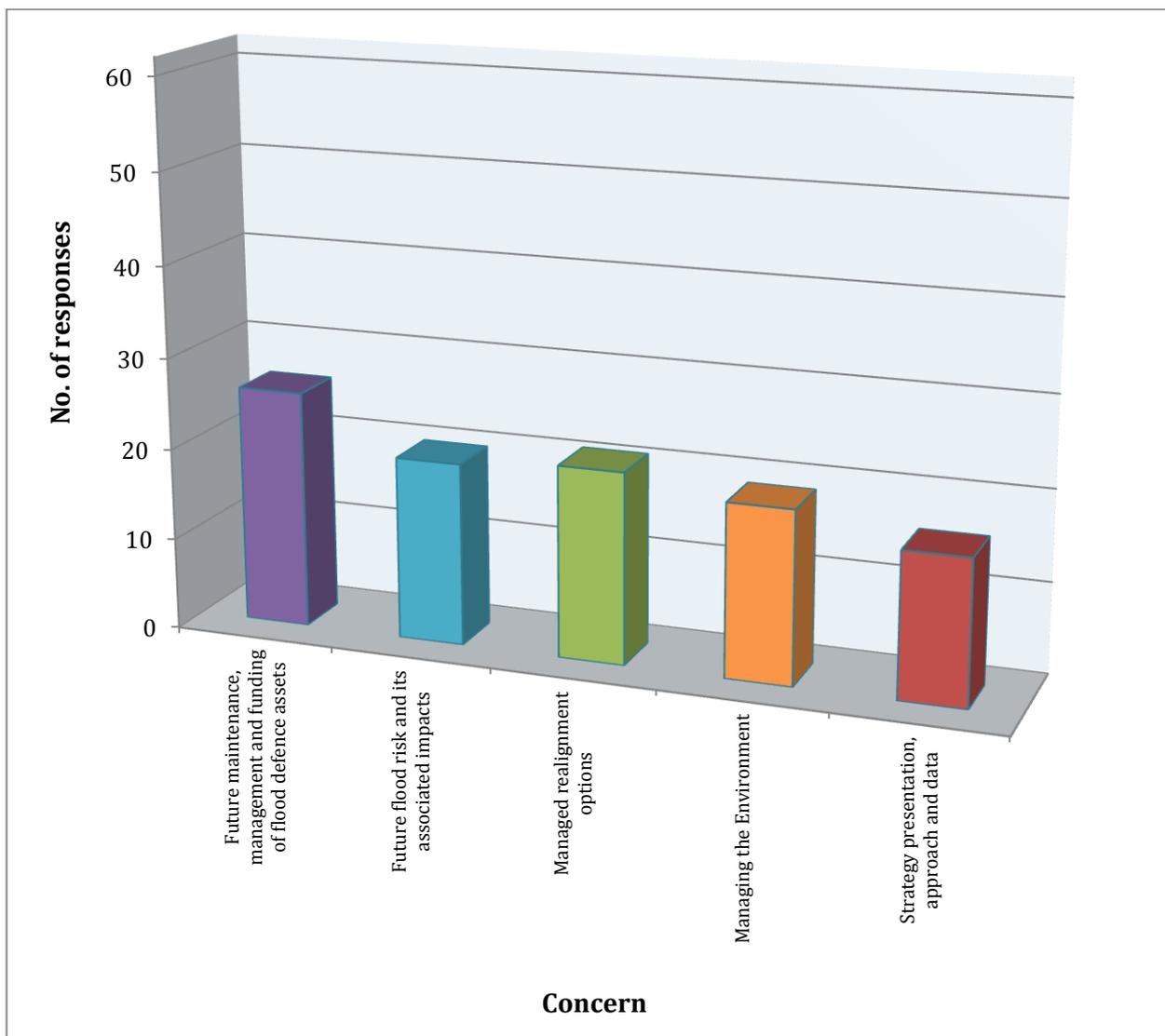
“...we understand that the Strategy is to be reviewed every ten years to test its robustness against actual data on sea level rise year on year. This would seem a very sound way to proceed”.

“ The principle of regular re-evaluation of the Strategy every ten years or when major changes take place would seem a sensible approach and might afford an ideal opportunity for a general information exchange between Infrastructure Owners and Flooding Authorities to raise awareness of any proposed changes that may impact on the continued delivery of Infrastructure Services”.

Key Themes for remaining concerns

Figure 1 shows the 5 key themes used to categorise concerns raised. Most concerns related to the future maintenance, management and funding of flood defence assets (26 responses). The next most common popular concerns (21) related to managed realignment proposals, closely followed by future flood risk and its associated impacts (20 responses). There were a further 19 concerns related to environmental management of the Natura 2000 Severn Estuary Site and 16 which focused on the presentation, approach and use of data within the Strategy document itself.

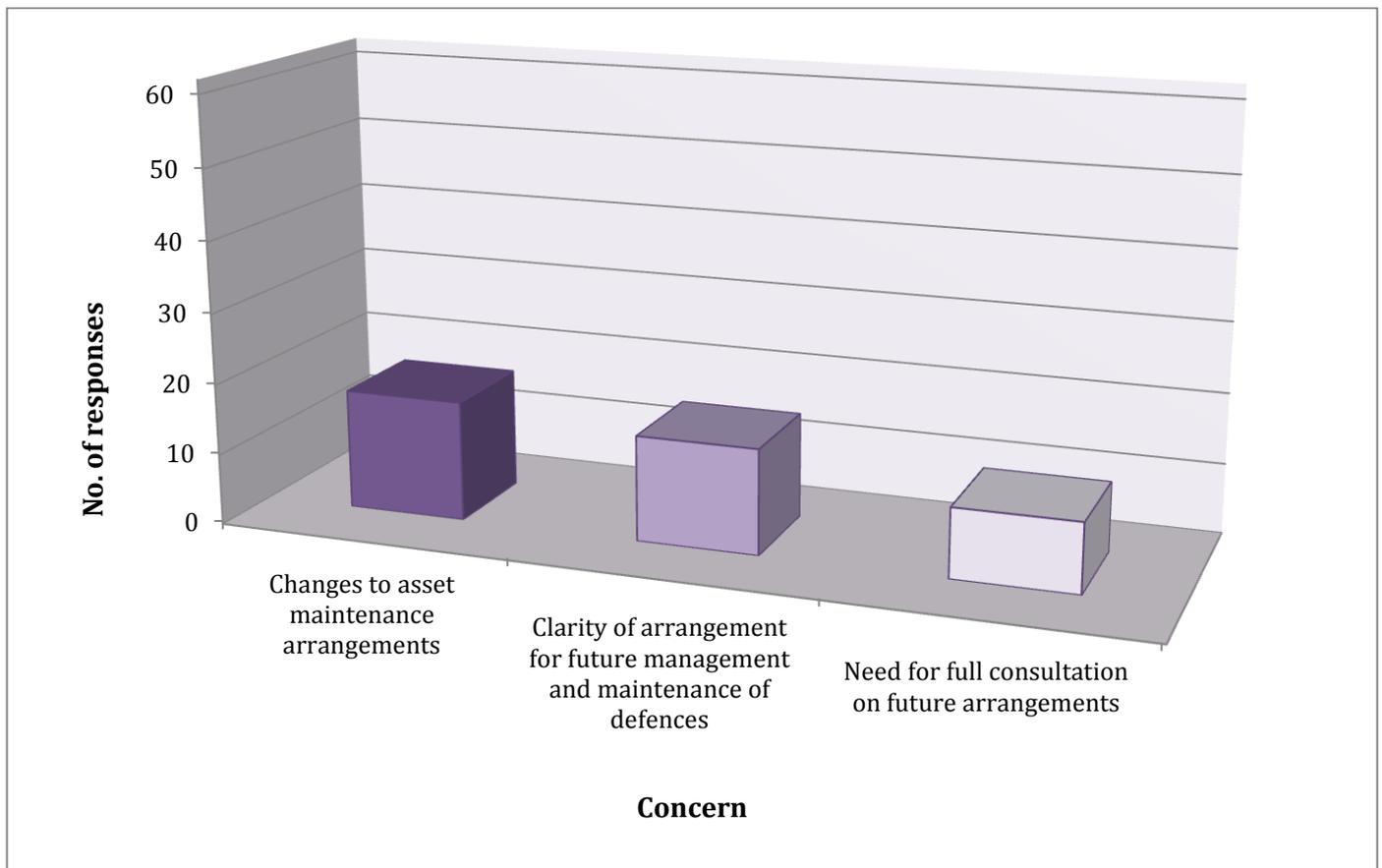
Figure 1 Key themes for remaining concerns



1. Future maintenance, management and funding of tidal and fluvial flood defences

Figure 2 illustrates a breakdown of the concerns related to the future maintenance of tidal flood defences. Of the 26 responses in this category, 64% (16) were concerned by any potential changes in arrangements for asset maintenance. Within this number, concerns focused on the potential legal liability that might fall on those taking over maintenance of defences and whether private and community funding would be sufficient.

Figure 2 Key concerns related to future maintenance and management of flood defences



14 respondents felt that the Strategy report lacked certainty or clarity on the future of management and maintenance of flood defences eg the Strategy lacked -

“firm direction for the future of asset maintenance and responsibility”.

10 respondents commented on the need for a thorough and clear consultation process when potential changes in arrangements for maintenance of defences are considered.

There are a number of responses concerning the current reduction in maintenance funding which means that EA either cannot now or may not in the immediate future be able to carry out all maintenance activities. The local response to changes in funding is outside the scope of the Strategy, though the EA will continue to engage with communities using contacts established during the development of the Strategy.

Figure 3 Key concerns with data collection and use in flood defence management

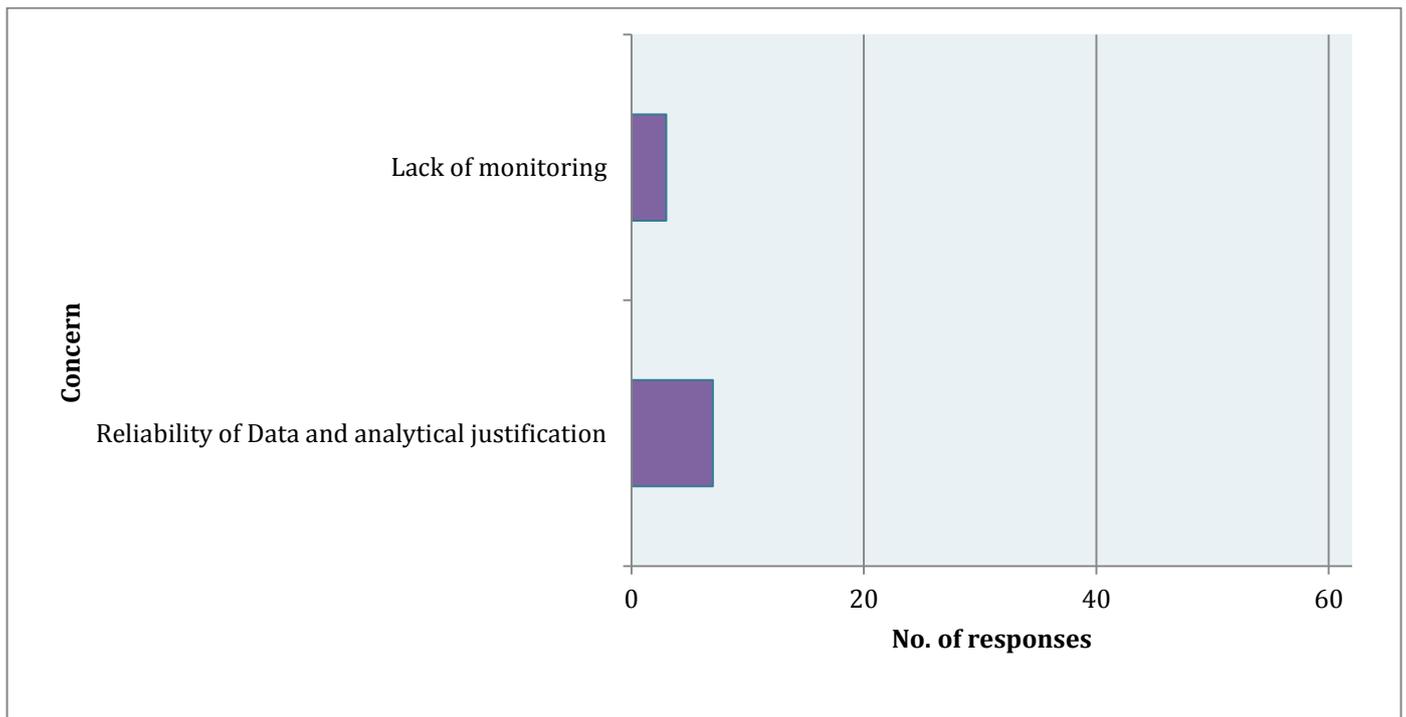


Figure 3 illustrates the concerns raised regarding data collection and use for planning and management of defences. 7 respondents felt that the reliability of data and associated information were key limitations to the Strategy.

3 responses also suggested a lack of consideration for monitoring. These responses expressed the need for all necessary data to be incorporated into planning, in order to provide an adaptive approach to flood management. There was concern that without comprehensive data and monitoring, future management would be compromised, particularly when trying to prepare for future climate change. These can be summarised by the concern:

“an adaptive approach to management would not be fully taken on board,”

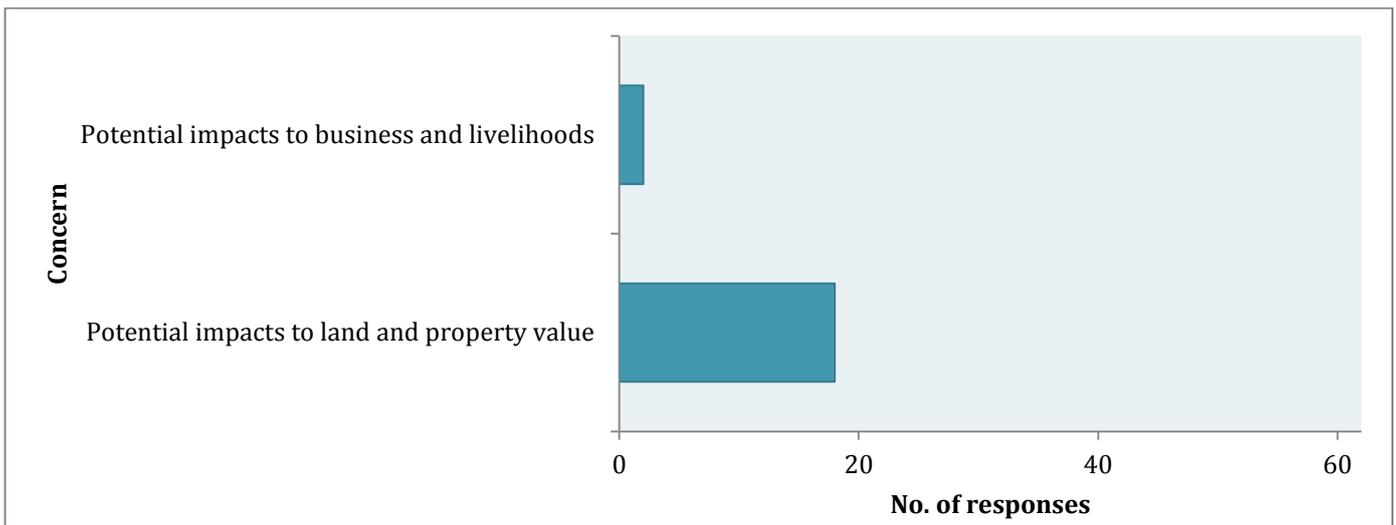
3 respondents voiced further concerns related to the limited consideration of related issues and future impacts. The issues mentioned as lacking consideration included fluvial flood risks and housing development. Concerns were made that the lacking consideration gave:

“insufficient weight to tangibles such as local priorities, community wellbeing, heritage and landscape, food security and wildlife.”

2. Future flood risk and associated flooding impacts.

Figure 5 illustrates the main concerns of those 20 related responses, which addressed impacts of future flooding. Of these, more related to land and property value (18 responses), with only 3 of these responses further concerned about business and livelihoods. Of those 18 individual concerns, 77% were made by local residents (14) and 16% (3) by parish councils. Only 1 response from a business representative indicated concern for potential impacts to land and property.

Figure 4 Key concerns regarding future flood impacts



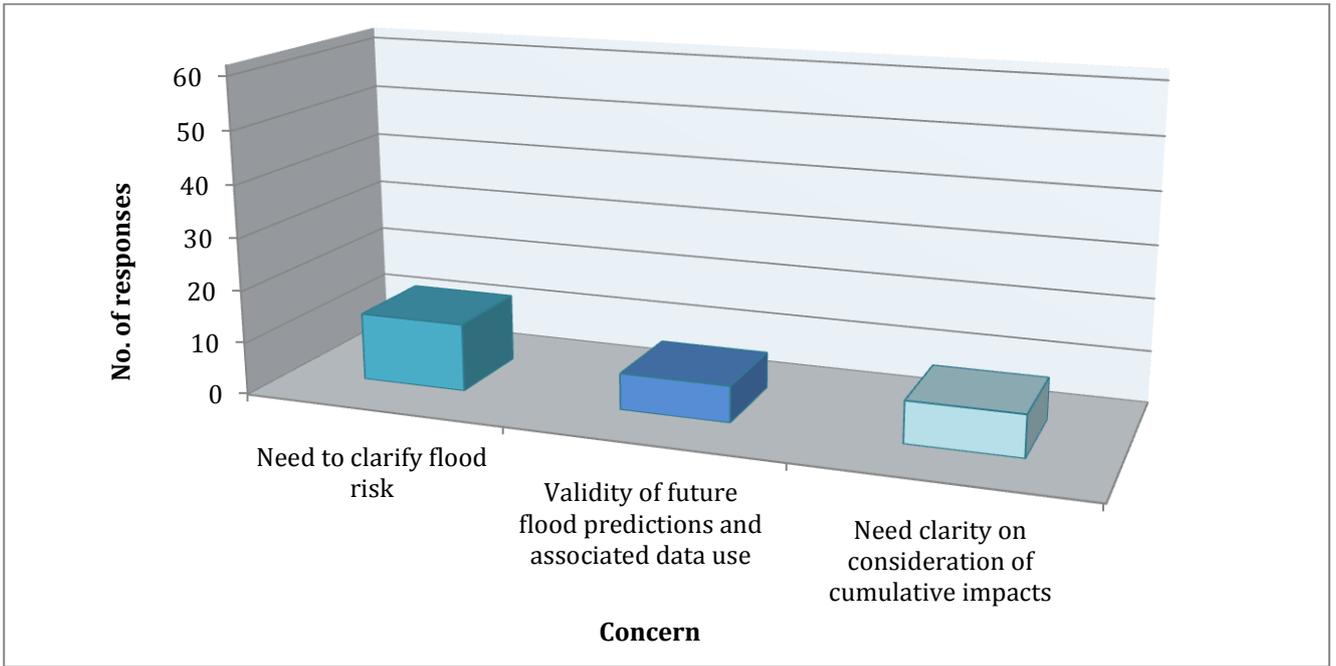
12 responses commented that the Strategy did not provide an estuary-wide approach to flood considerations and predictions, which they felt would have been beneficial. Despite this, only 5 responses pointed to specific concerns with the Strategy's estuary-wide flood predictions. In contrast, 15 responses indicated particular concern for flood risk at a local level.

Figure 6 illustrates concerns, which arose regarding the Strategy's information relating to flood risk, including its analysis and presentation. Some responses also suggested that there was need to clarify areas of potential risk so that people know the flood risk they face. For example, 12 responses considered that the maps "do not reflect the current situation" accurately. No flood maps were included in the consultation material so it is presumed these comments relate to flood maps on the EA website. Refer to "Topics raised outside the scope of the consultation" at the end of this report.

As noted in relation to managed realignment (Section 3), there were concerns raised regarding the validity and provenance of the flood predictions (7 general responses) and confusion as to whether predictions were based on extrapolation of current sea level trends rather than other predictions (UKCP09).

Consultees were keen to establish whether or not the models used by the Strategy had taken account of the relevant factors individually or in combination. As one respondent stated - "the interaction of these factors could be critical to the situation". In addition, 8 responses expressed concern as to whether or not the Strategy had considered cumulative impacts between planning cells. Of these, 6 were concerned about an apparent lack of clarity and adequate explanation of how the Strategy would deal with such cumulative impacts.

Figure 5 Key concerns related to assessing future flood risk

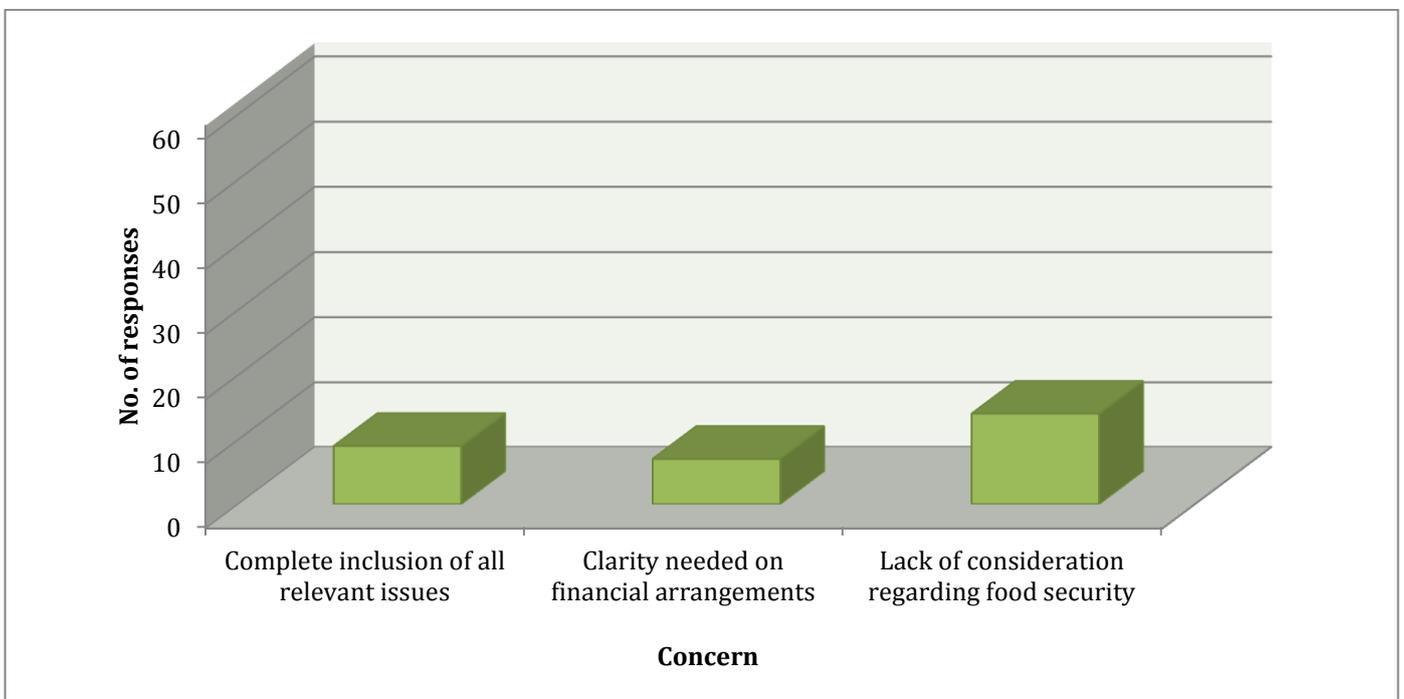


3. Managed Realignment options

A total of 14 respondents were concerned that the strategy options do not consider food security and of these, 10 were specifically concerned that the options for managed realignment did not incorporate food security into their planning.

A further 9 expressed concerns regarding the practicalities of options for managed realignment that are available within the strategy. A lack of consideration of all impacts was seen as an issue (Figure 4). 4 responses indicated that the strategy lacked clarity on financial arrangements for landowners when managed realignment projects were considered.

Figure 6 Key concerns related to managed realignment options



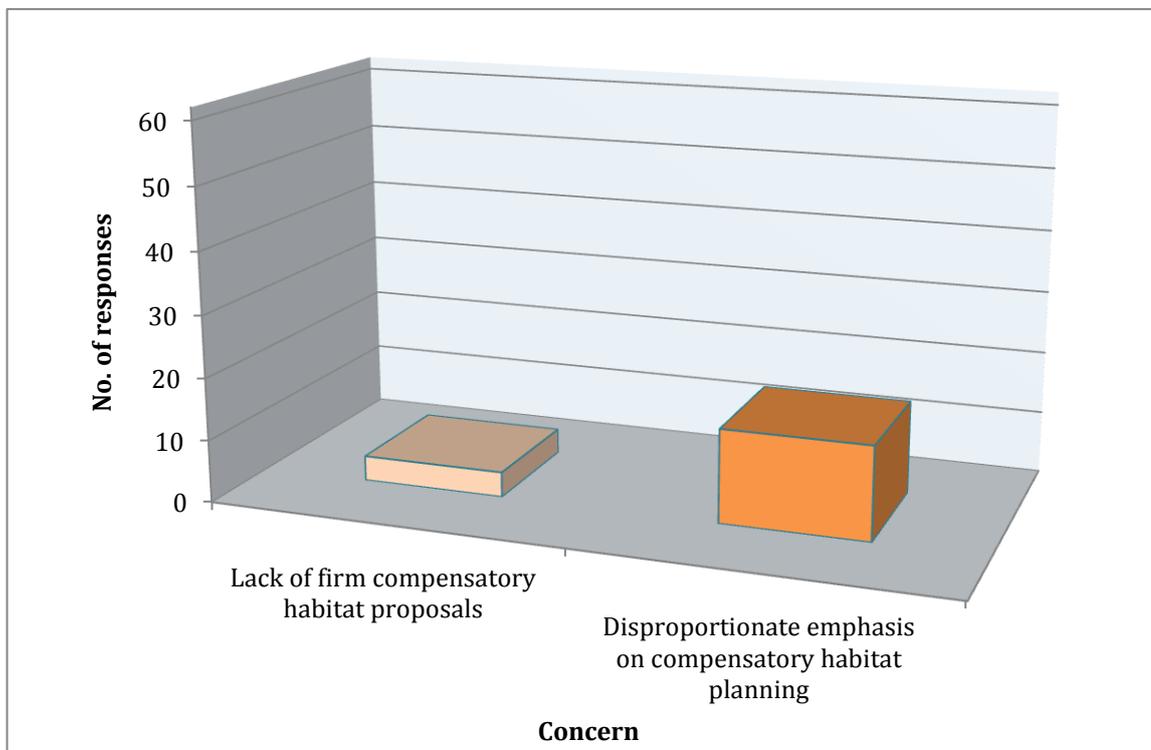
4. Managing the Environment

This section illustrates the concerns voiced within the responses relating to the Strategy's actions for managing the impacts of flood defences on the internationally designated Natura 2000 site of the Estuary and the need to create habitat to compensate for that lost as sea levels rise.

As shown in Figure 7, 15 respondents considered that compensatory habitat creation took undue priority within the Strategy. 12 highlighted concern over the economic analysis associated with such habitat creation schemes. Within these responses, some even went so far as to question the calculation of "value of any artificial created inter-tidal habitat" created as a consequence of flood defence relocation.

In contrast, there were concerns raised over a lack of firm and detailed proposals for habitat creation, particularly for compensatory habitat (4 responses). Whilst one respondent expressed concern that the Strategy "fails to address how internationally important habitat will be compensated for" a further 3 responses expressed a lack in confidence in the Strategy's likely ability to meet compensatory requirements. Another respondent suggested that, the use of revised climate change predictions has reduced the extent of managed realignment sites around the estuary, which was contrary to "policies for coastal cells agreed in the SMP2".

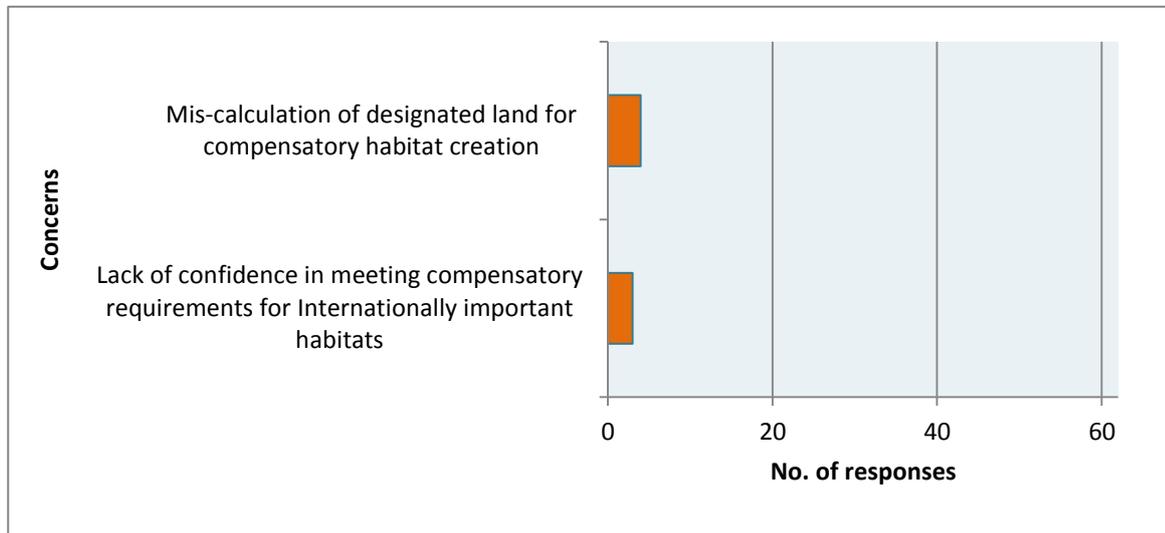
Figure 7 Key concerns related to compensatory habitat creation proposals



In terms of the Strategy's general approach there were further concerns. 2 responses commented on the Strategy's apparent lack of explicit adherence to the precautionary principle. Others maintained the

document’s lack of a clear overview of the entire Estuary hindered understanding of the changes proposed, including managed realignment and the location of future proposals.

Figure 8 Further concerns related to compensatory habitat proposals



Some respondents disagreed with the assessment of the quantity of compensatory habitat that might need to be provided in the future. 2 were simultaneously concerned that the strategy’s options could limit future opportunities for securing compensatory land. A further 3 responses had issues with the data and methodology used in these calculations.

1 response suggested that alternative predictions of sea level rise (using UKCP09, for example) should be used instead of the apparent extrapolation of current trends to aid proposals for producing compensatory habitat. In relation, other respondents expressed concern that without future predictions incorporated into future flood estimates, unanticipated environmental impacts could occur. Cited impacts of this included habitat loss and coastal squeeze, with 1 respondent suggesting this could lead to a coastal realignment programme “which will not adequately produce established habitat in time to mitigate for habitat loss”.

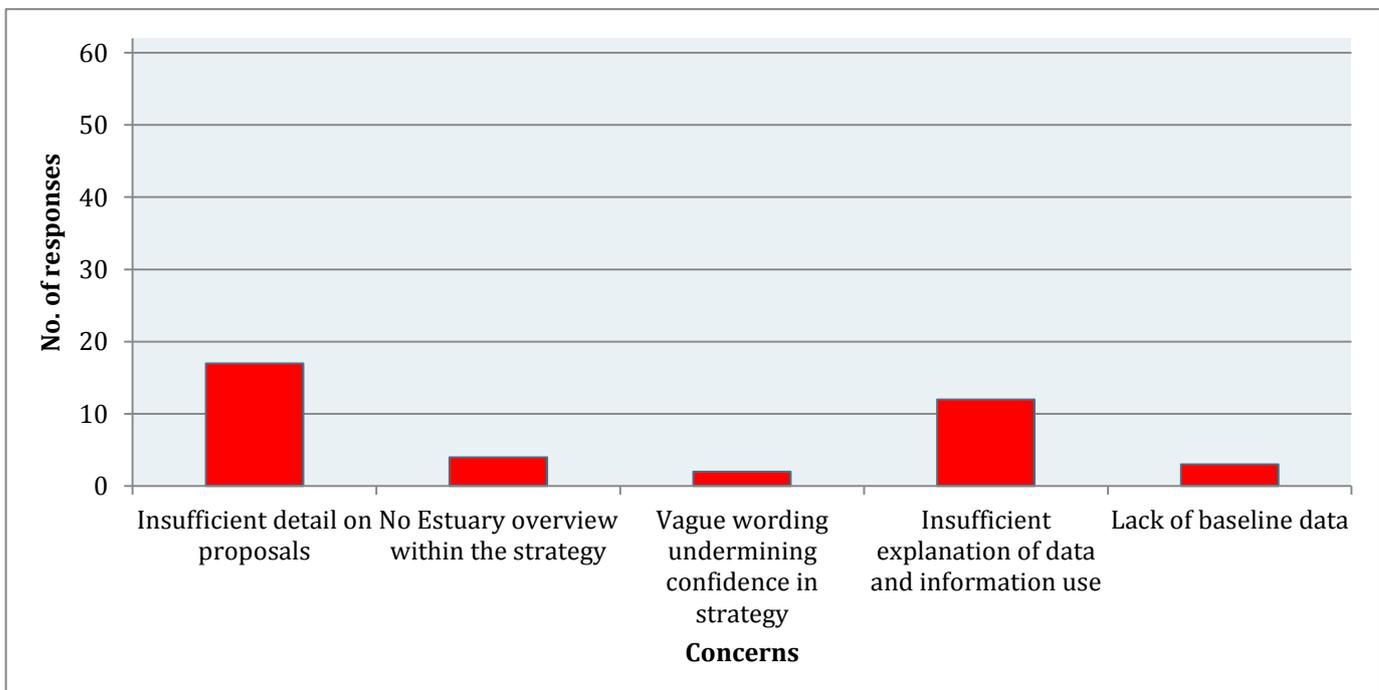
5. Strategy document, presentation, data and information.

This section differs from the previous themes in that this section reports on respondents' concerns related to the layout and content of the Strategy documents, rather than reporting issues relating to management and on-the ground issues. However, it should be noted that responses referring presentation and data/information issues, have also been mentioned, as appropriate, within previous sections (1-4), under relevant themes.

Considerable numbers of respondents praised the document compared with the previous one, though 11 respondents felt that the current Strategy could have been more precisely worded, notably its summary of key proposals. In particular, matters relating to future management, notably arrangements for maintaining flood defence maintenance, were cited as unclear. A couple of respondents expressed concerns over vagueness in the over use of words such as 'most', 'should' or 'as funds allow'. These, they suggested, could undermine the implementation of and confidence in the Strategy. However, respondents in general welcomed the re-engagement process, the further explanation of options within the strategy and changes to terminology and language.

Figure 9 indicates a breadth of concerns relating to this theme. The most widely held view was that consultees would like more detail on proposals across the range of themes that are dealt with earlier in the report.

Figure 9 Key concerns related to the Strategy document, presentation, data and information



12 respondents felt that, in general, the Strategy did not explain the way in which data had been used particularly effectively, and suggested that the document could have justified its decision-making more effectively. Furthermore, there were issues raised over this lack of information in relation to the analytical justification provided within the document, with concerns specifically relating to:

“the methodology used to assess the benefits of capital expenditure on flood defences.”

Other responses highlighted issues with the presentation of information and explanation of decisions and criteria used. In relation to figures within the document, 3 respondents cited a problem with a ‘lack of baseline data’. These responses also included specific concerns about using uncertain baseline data for determining strategy options.

Summary

This report is a summary of all 62 responses to the Environment Agency's consultation for the revised Severn Estuary Flood Risk Management Strategy 2013 (20 May - 31 July). It is encouraging that a large proportion of the respondents provided positive acknowledgement of changes already made to the strategy and expressed encouragement of the continued success of this process.

Most concern expressed by respondents related to the future management and maintenance of flood defences, particularly where there may be a change in approach or arrangements. Nearly half (26) of the responses expressed issues related to this.

Potential options for future management realignment were a key concern, there being views the impacts of these options had not been adequately investigated, or that insufficient detail was available. Not expressly considering food security in options for realigning defences was a commonly-held concern. Conversely, there were views that the strategy did not identify the appropriate level of compensatory habitat so there was a lack of confidence that the impacts on the Natura 2000 site could be managed.

Regarding presentation of the strategy documents, there were views that more detail within the proposals and more explanation of how data has been used to make decisions would have been beneficial.

Topics raised outside the scope of this consultation

Funding for works to Flood Defences

The Strategy sets out the EA's intention to maintain, and in some cases sustain or improve defences where there is a business case to do so. The EA's actual actions, year by year, will always be subject to funding that is available to it.

There are a number of responses concerning the current reduction in maintenance funding which means that EA either cannot now or may not in the immediate future be able to carry out all maintenance activities. The local response to changes in funding is outside the scope of the Strategy, though the EA will continue to engage with communities using contacts established during the development of the Strategy.

EA Flood Maps

The consultation material did not include any flood maps (following criticism of the inclusion of flood maps in the 2011 consultation). Nevertheless, 12 respondents were concerned over the use and accuracy of flood maps. The EA has recently updated the flood maps available on its website.

Local Issues

There were several responses relating to local issues at precise locations. These cannot be added into a summary of strategic issues raised on the estuary but have been passed to the EA's local Area offices to follow up.

Severn Barrage

3 respondents thought that a Severn Barrage should be developed as the key means to manage flood risk in the estuary. Development of a Barrage requires a decision by Government to do so. The Government's current position regarding the Severn Barrage can be found at the following link

<http://www.publications.parliament.uk/pa/cm201314/cmselect/cmenergy/622/62204.htm>

Appendix: Sectoral distribution of consultation responses

Sectoral Distribution	No. of responses
Local resident	14
Local /national business	2
Local Landowner/homeowner	3
Recreation user of the Estuary	0
Individual	4
Interested Party	0
Representative of local authority	3
Elected member of local authority	2
Representative of a related interest group/association	12
Representative of NGO	6
Elected member of parish/District/ town council	14
Representative of a registered charity	1
Other	1
Total	62