

Telephone: 01394 282086
Fax: 01394 285920
email: enquiries@felixstowe.gov.uk

9 am to 4 pm Mondays to Fridays



TOWN HALL
FELIXSTOWE
SUFFOLK
IP11 2AG

FCERM National Strategy Consultation
FCRM Strategy Team c/o Morena Staiano
Environment Agency
Horizon House
Deanery Road
Bristol
BS1 5AH

3rd July 2019

Dear Ms Staiano

Draft National Flood and Coastal Erosion Risk Management Strategy for England

Climate Change and the Coast.

Thank you for the opportunity to respond to the consultation on the above strategy, please accept this Response Note as a valid response with the intention of making clear our broad support for the principles, with some detailed comments where relevant. We have also made some brief comments, consistent with this Note, via the Word version of the Response document

1) Background and context for FTC response.

Felixstowe Town Council (FTC) is aware of many of the issues becoming apparent in the contexts of climate change. Similarly, government policies and funding for managing Flooding and Coastal Change have been evolving rapidly over the past 15 years.

FTC welcomes the principle of the Strategy as a first step toward much greater integration of these areas of policy.

These issues are highly relevant to our community. Felixstowe is a town of some 25,000 people located on a coastal peninsula bounded by the North Sea and the Orwell and Deben estuaries, a thriving coastal resort and the home of the UK's largest Container Port with a long history of major events of both coastal erosion and severe tidal flooding, and significant ongoing long-term vulnerability to both. The coast of England, and not least Suffolk, has been subject to flooding or coastal erosion for thousands of years, which have been managed in a variety of ways since at least the middle ages, irrespective of climate change. This is equally true of the both the coastline and the Deben and Orwell estuaries affecting Felixstowe. By far the most significant event affecting the town was the 1953 floods, when the town was flooded, not from the sea, but by a catastrophic failure of a flood bank on the river Orwell, behind the town, beneath what is now the site of the Trinity Terminal of

the Port of Felixstowe. The Langer Road area was flooded to a depth of approximately 2 metres and 41 lives were lost, as is now annually commemorated at the flood memorial in Langer Road.

Actual and potential erosion of the soft cliffs in front of the higher areas of the town remain a permanent potential danger, with a major collapse near the Dip in 1986 and smaller events near Brackenbury and behind the Spa Pavilion in the 1990s.

The town is currently fortunate to have exceptionally good defences on our entire tidal frontage, with major protection schemes by the District Council at The Dip 1986/7, South Felixstowe in 2008 and Central Felixstowe in 2012, while the EA and its predecessors have built or improved flood defences on both the coastline to the north and south of the main urban area, and in the estuaries progressively since 1953. Additionally, the frontage to the Orwell estuary is now well protected by the presence of the port quays which did not exist in 1953.

Accordingly protection of the town from both flooding and coastal erosion has been in place in various forms for some hundreds of years, and were indeed formative in the creation of the modern town and community as we now know it when the modern town was built as a resort in the years from approximately 1895. FTC therefore has a direct and immediate interest in the evolution of plans for flooding and coastal change.

However, all the traditional thinking and assumptions on these matters is now needing to begin to be re-evaluated in recognition of climate change. In the context of Flood and Coastal Change Management, climate change is now predicted to have possible significant major effects in 2 ways: a) increased storminess, with extreme storms and tidal surges becoming more common and possibly more severe, and b) longer term potential sea level rise (SLR) rendering current defences progressively less secure or indeed possibly ineffective or unsustainable, on a 50 or 100 year view. There are many views on the likely scale and timescales SLR, but the Chairman of the EA, Sir James Bevan, has recently proposed that a balanced current target for consideration of coastal defences or management would be of the order of 0.7m rise between 50 and 100 years hence.

Felixstowe is in the fortunate position of the great majority of the tidal frontages having a "Hold The Line" policy in the Shoreline Management Plan, with the exception of the 2 extremities at Landguard in the South and a small part of Felixstowe Ferry in the North. Nevertheless, even on the main seafront and promenade areas, it will be necessary in future to consider some difficult issues around SLR, if a rise of the order of 0.7m is to become a policy stance, let alone a reality in future decades.

2) FTC Overview of Draft Strategy

FTC has no direct responsibility for management of coastal change, but is crucially reliant on effective measures being taken in both the short and long term by the Coast Protection Authority, East Suffolk Council (ESC) in respect of the higher parts of the town subject to coastal erosion and by the Environment Agency (EA) in

respect of flood risks both directly from the sea and from the adjacent Orwell and Deben Estuaries.

We recognise that ESC and the EA can only deliver the security from coastal change critical to the future of our community if supported by appropriate policies from all elements of government and the other responsible agencies - and the availability of funding to support the implementation of those policies.

FTC therefore greatly welcome the principles of the Draft Strategy, based on the Vision: "A nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100". We support this as a target outcome without reservation.

However, achievement of the Vision will be dependent on the core concepts around Resilience, Adaptation, and Place, currently barely recognised in legislation, becoming government policy and being supported in legislation, cross-departmental policies and in funding mechanisms from both public and private sources. It is critical that HMG policy provides for the Vision to become a reality, hence It is in that context, and in the hope of influencing that process that we make these statements.

FTC recognises Climate Change as a challenge in many contexts and is addressing those challenges already in several ways. We will seek in future to work with the statutory agencies to do that in respect of Flooding and Coastal Change.

Our overview of the Strategy and the Consultation process is that:

- a) The "Vision" and the "Introductions" section, along with the 3 "Ambitions" represent a fundamental and very necessary shift in the core approach to Flood and Coastal Management (FCCM), which in broad principle we strongly support.
- b) However, the more detailed parts, "Strategic Objectives" and "Measures" are not well articulated, and only partially address the matters raised in the Vision. They also contain a great deal of detail which FTC are not well equipped to comment on in detail.
- c) Unfortunately, the actual structure of the Strategy document itself make it difficult to easily assimilate and understand the relationships between the above levels. For example, the Vision itself appear only on the front cover and buried in small print on page 6. It does not appear in the core expression of the overall concept, the diagram on p. 15. Equally the Ambitions themselves appear only in the body text on page 15, again not in the diagram, and then are not numbered or presented in overtly separate sections in the body of the document, on pages 16, 32 and 44. This makes it a matter of some perseverance to grasp the content as a related whole, with the unfortunate outcome of a number of misunderstandings arising in discussions about the Strategy.
- d) The Online / Word Consultation Document is structured to concentrate on fragments of detail, making it very difficult to respond positively and interactively on the core issues, which are those on which FTC feels best able to comment.

Accordingly, we are presenting our views in this Response Note, with the intention of making clear our broad support for the principles, with some detailed comments also where relevant. We therefore request that this Response Note also be considered as a valid response. We have also made some brief comments consistent with this via the Word version of the Response document.

3) Vision and Chairman's Foreword.

- FTC supports the Vision, its wording and the critical underlying principle of a joined up approach to a wider, all-encompassing approach to the issues, in contrast to the fragmented approach currently in being, focussing of houses protected from flooding and some environmental issues, but little on places the economy, growth or infrastructure being collectively managed.
- FTC supports the phrase "Flooding and Coastal Change" (FCCM). We perceive this as expressing very well the integration of flooding from whatever source, and coastal erosion, and specifically management of the coast and estuaries as a whole. This is the key to future success in these areas, in even a static climate situation which has effectively been the case until now, let alone combined with the need to understand and plan for the uncertainties around climate change. However, we regret to see that while FCCM is used consistently throughout the document, that does not apply to the title itself, where the outworn "FCERM" phrasing is still used. We entreat the EA to amend that in all future work on the Strategy.
- FTC greatly appreciates the emphasis in the Chair's Foreword on the coast generally and the example in the very first line on the catastrophic events of the East Coast Floods in 1953, and also the phrase in the Introduction on p.4 that "Erosion destroys". We see this as welcome evidence that at last the EA is taking on board the intent of the 2010 Flood and Water Management Act 2010 to achieve that integration via the EA Strategic Overview, the evolution to the Regional Flood and Coast Committees and so on. This has not always evident over the past 10 years. FTC is hopeful that this emphasis will continue to be a driver for further policy and funding development as the Strategy, followed hopefully by HMG policy, becomes embedded over coming years.
- We welcome recognition of the importance of the coast as an entity, and the need for Coastal Change Management to become a widespread and embedded issue in Flood and Coastal Management contexts.

4) Introduction, pp. 4 to 15

- FTC broadly welcomes the content of this section, emphasising the need for a wider holistic approach to the coast in particular, and the impetus it provides for all levels of government, including local councils such as ourselves to begin to understand the potential impacts of climate change and SLR, and for our communities to do likewise over time.

- FTC welcomes recognition of the need in certain circumstances for building in flood zones but coupled with the safety and resilience needed to safeguard the community. It is important that simplistic suggestions like "never build in a flood zone" do not lead to ongoing degeneration of communities, as happened in some cases in South Felixstowe 10 or 15 years ago, but that conversely the real risks of events significantly more damaging than in the past are recognised, with both safety and resilience to flood recovery becoming the norm. This needs to be the case in both terrestrial planning development and in flood and erosion defence planning. In that context the recognition of ongoing growth and regeneration alongside due diligence in risk management is welcomed.
- The phrase "Looking to the year 2100, the draft strategy aims to blend long term ambitions with shorter term practical steps." (Page 6, para.6) seems to FTC to express well the approaches needed. That approach needs to be driver for the routine updates and revision of a range of planning documents, including but not limited to Local Planning Authorities' Local Plans, the Shoreline Management Plan (about to commence a Light Touch Review), Action Plans by ESC and the EA in respect of local coastal defence structures, and both capital and maintenance funding provision for those both locally and nationally.
- FTC welcomes the "wake-up call" in respect of potential sea level rise (SLR), while recognising that estimates of the timing and scale of SLR remain very uncertain and volatile, with wildly differing estimates coming from a plethora of sources. We hope that this will begin the process of the issue becoming recognised as a necessary factor in future planning by both the public in general including coastal businesses, and all public bodies. However, the wide ranges of the risk parameters on page 5 will need to be narrowed, with a strong evidence base rather than academic speculation, as the time approaches when decisions are required in respect of particular locations or projects.
- FTC supports the need for recognition of adaption to change - the challenge will be to educate and interact with public. In local terms we recognise that over future decades this may involve difficult changes to the resort sea front and /or to flood banks on the southern and northern floodable frontages , or to the estuaries, and indeed the Port quays and other infrastructure - which form a significant element of the town's flood defences.
- FTC supports the concept of managing "places", rather than fragmented into housing, commerce, tourism, ports, infrastructure, environmental issues etc.
- Under "People, places and plans" on p.9, there needs to be a much fuller development of the need for convergence and interaction between FCCM and Local Plans, which will be essential to the changes in basic thinking about the future of coastal communities in the context of climate changes affecting the coast, increasing storminess and SLR. This will require a much higher degree of coordination between DEFRA and MHCLG in these areas than has been

evident to date. The EA Strategy, although not responsible for those areas, needs to “paint the picture” of that need.

- In the section on “roles and responsibilities”, the roles of Unitary, Upper and Lower tier Local Authorities as Lead Local Flood Authorities, Coast Protection Authorities (CPAs), Local Planning Authorities and other areas such as public health and building regulations are not clearly explained, and not fully consistent with the diagram on page 13, which needs significant changes in this respect. Specifically, the role of CPAs as responsible, within the EA Strategic Overview, for regulation and where appropriate provision, of coast protection works on erodible frontages is under-played and not explained.
- As mentioned above in item 2) C) the “layers” diagram which should be at the core of aiding understanding of the entire Strategy is incomplete and unhelpful. It should be re-thought and repositioned in a future document so as to clearly illustrate the relationship between “Vision”, “the 3 Ambitions”, “Strategic Objectives”, and the presentation of the whole document needs modification to the same end.
- The role of the Regional Flood and Coast Committees in locally prioritising available Grant in Aid, or in raising and allocating Local Levy is not made clear anywhere. Similarly, the meaning of the RFCC “halo” in the Overview is not clear.

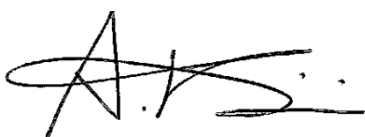
5) The three Ambitions

So far as we are qualified to comment, FTC strongly supports each of the core principles which make up the Strategy:

- Climate Resilient Places, p. 16,
- Today’s growth and infrastructure – resilient to tomorrow’s climate, p.32
- A nation of climate champions, able to adapt to flooding and coastal change through innovation, p. 44

FTC is not in a position to comment in detail on the sections on Strategic Objectives and on Measures. However, a limited examination of those sections appears not to support the radical new thinking which we have supported in the above sections on Vision etc. It will be important in the final document to ensure that the details in this area are fully in tune as a viable delivery mechanism of the new approaches which will be required as understanding of the complexities of FCCM develops and further evidence of climate change and its impacts in this area becomes available and a consensus is formed on the policy issues dependent on that.

Yours sincerely,



Ash Tadjrishi
Town Clerk