



# Minsmere Levels Stakeholders Group

Response to Environment Agency's  
**East Suffolk Catchment Flood Management Plan June 2008**

## 1. Our background and interests.

The Minsmere Levels Stakeholder Group was formed in February 2008 to become involved in any actions relating to the Minsmere Internal Drainage Board area. The major topics for action have been identified as:

1. Discussions with IDB to ensure routine maintenance of ditches and land drains. Involve major landowners in co-operative discussions.
2. Establishing links with conservation bodies to explore common interests on the management of water levels and protection of our coast.
3. Negotiations with Environment Agency to ensure that the New Cut and Sluice are maintained in the medium term, and that action taken if e.g. blocked by shingle.
4. Encouragement of a long term strategy for managed re-alignment if necessary along the shingle bar from Minsmere Cliffs to Sizewell. Negotiate with national bodies, Environment Agency etc., re 'sensible action' on Shore-line Management Plan.

Following a public meeting on 11<sup>th</sup> April in Theberton, at which over 60 people attended, and 35 signed up as becoming members interested in the above topics, we plan to hold a second meeting on 18<sup>th</sup> July, to update on progress to date.

## 2. Response to your draft Flood Management Plan.

The 18<sup>th</sup> July is your closing date for submissions, so this is an interim response, prior to the public meeting. We may well amend or supply additional comments following that meeting.

## 3. Overall Comments.

We welcome the publication of a draft strategy plan to discuss how flood risk management should be structured, and identification of a methodology for assessing and prioritising flood management work. In particular that the Environment Agency has taken the lead in reviewing and developing flood protection plans.

By their very nature floods are caused by random extremes of weather, and the recent publication of the full Pitt report on the lessons to be learnt from the summer 2007 floods, in Yorkshire and later Gloucestershire, Worcestershire and the Thames Valley highlights the large numbers of people affected and properties damaged, including major infrastructure: electrical sub stations, sewage

works, transport and water supplies. Clearly major investment by utility companies etc is required to ensure that any similar flooding in the future does not cause so much chaos.

However in November 2007 a storm surge down the East Anglian coast caused a 2 m surge tide; fortunately the major surge passed through near low water; if it had occurred on top of the high tide then major towns such as Lowestoft and Yarmouth would have been inundated, and a second Pitt report would be being written now on the problems relating to sea flooding. Your review of local infra-structure at risk is clearly essential information in anticipation of serious flooding both fluvial and from the sea, provided that follow up action is taken to minimise future flood risk.

Long term climate predictions indicate that weather extremes such as storm surges will be increasingly likely in the future; this is in a much more immediate time scale than any significant rise in sea level due to melting ice, recent estimates suggest a rise of about 40 cm by 2100.

There is a serious danger that emotion and public pressure forces the EA to 'fight the last war' and focus ALL its attention into defending against a repetition of the 2007 floods, at the expense of providing continuity of expenditure on other flood risks.

The development of Shoreline Management plans, currently in their second iteration, has used a very simple economic appraisal model to assess the level of funding provided, which focuses on residential and commercial property values, but does not take into account many other factors in rural economies, such as other property values, local economy and heritage, yield from agricultural land etc. There is a clear message that voting numbers count most.

Other national and international economic changes, such as the recent and current very dramatic increasing cost of oil and food staples, the use of agricultural land for production of bio-fuels to replace fossil fuels, all will have significant effects on the future valuation of agricultural land. The casual writing off of 'low quality' farm land on the Suffolk coastal area based on historic land values is no longer justified. The recent interest in buying locally sourced food is increasing the viability of previously marginal farm land. Once such land is abandoned e.g. to the sea, it will be extremely expensive to reclaim it again.

#### **4. Minsmere Levels in detail.**

This region is at risk from both river and sea flooding.

##### **River flooding:**

The levels are a natural flood plain, and perform that task very well, taking river water from the Minsmere River (flowing in the New Cut) and holding it until the water can discharge through the sea Sluice. The New Cut was dug in around 1813 through reed beds of the old Minsmere River to the sea, creating water meadows and pasture land. Most of the area is SSSI, including the pasture land to the west of Eastbridge. The area owned by the RSPB (to the north of the New Cut) is classified Ramsar and part SPA; the RSPB site has been developed to encourage bitterns within reed beds and requires reasonable water level control to maintain its environment. The RSPB expend considerable funds each year to maintain the required conditions. To the south of the New Cut the land is mainly owned by British Energy and managed by Suffolk Wildlife as a nature reserve.

The sea sluice acts like a 'cork in a bottle' and under normal conditions water discharge allows flood water to discharge over a few days. However strong north easterly winds bank up the sea water and can minimise the discharge rate; in 2001 it took nearly 3 weeks to lower the marsh water level to normal. Heavy rain last summer raised the marsh water level during the nesting season, leading to the loss of most of the young bittern chicks. Again this May, with unusually high rainfall, some 160 mm in 3 weeks, the marsh flooded and water covered the road from Eastbridge to the RSPB reserve.

## Sea Flooding:

In 1938 and again in 1953 storm surges forced a sea water breach through the sea wall, leading to major flooding. The storm surges of November 2006 and November 2007 caused some overtopping on the outer sand dunes but the clay bank, although damaged, was not breached and only limited salt water entered the RSPB reserve. However the shingle movement caused by the surge tides did block the sea sluice and river water discharge was stopped for about 10 days, leading to raised water levels in the levels.

The 'natural line' of the coast at Minsmere is approximately a straight line from the Dunwich Cliffs to the harder reinforced area at Sizewell around the Power stations, and so any significant 'managed retreat' policy of abandoning the coastal sea wall is unlikely to be successful. Long-shore deposition of material released by coastal erosion will maintain approximately the same shore line, with short term breaches caused by storm surges being filled naturally. The predicted longer term rise in sea level due to global warming is not a major threat to this coast in the next 50 years, however the effect of storm surges are and should be included in any medium term planning of drainage. In this region it is not sensible to separate the Shoreline management from the inland flood assessment.

The Levels environment is totally affected by the performance of the sluice, any failure of maintenance would put the whole area at risk. Regular maintenance of the New Cut, by vegetation clearance and proper desilting, is essential if the water level on the marshes is to be controlled in an adequate manner.

## 5. Comments on Policy unit One: Suffolk Coast and heath area proposal . ( = Reducing existing flood risk management actions)

In the introduction, page 10, there is reference under ***flood risks to the environment*** to (sic) '*Most risk it to the Sizewell Marshes SSSI (35 % at risk)*'. Presumably that means the Minsmere Level region, if the Ordnance Survey geographical names are used ?

In the Action list of ***Resilience and Resistance*** projects for this area (page21) there is NO mention of the Minsmere Levels. This includes a Ramsar Site, SSSIs and SPA, all of which are at risk from both fluvial and sea flooding, unless adequate maintenance is provided, both for the New Cut and Sluice, and for the shore line defences.

The Action : '***Environmental Enhancement Project:*** (page 22) '*to improve the natural state of the river and its habitat. Reducing maintenance activities provides the opportunity to improve flood plain connectivity, in stream geomorphology and aquatic habitats*' totally fails to acknowledge the work done on the Minsmere river for the last 200 years, which has created a well managed and unique series of environments suitable for a range of farming and wild life, which attract many people to the area. The stated ***Objective:*** '*protect and enhance habitats and species*' is totally at variance with the actual effect of reduced maintenance, and does not involve any of the relevant land owners or land managers. Neither does it mention the East Suffolk Internal Drainage Board, who are responsible for the maintenance of the main drains along the edges of the levels, and which feed into the new Cut close to the sea sluice.

## 6. Overall Conclusions.

The initial objectives of developing a flood risk strategy are welcome.

However the methodology of establishing a sensible cost/benefit analysis to decide where to cut back on maintenance and investment is not adequate and needs to include a wider range of factors. This exercise may easily be seen as just a means of cutting back on responsibilities and thereby saving money. All too often short term savings are a false economy as longer term damage by lack of routine maintenance usually proves much more expensive over a longer period of time.

Government planning to focus on one or three or five year plans does not fit well into the longer term strategies required to optimise expenditure for minimising flood damage, which we noted at the beginning, is random in nature. Similar serious events MAY not occur for many years, resulting in debate about whether it was a waste of money.

Other valid points brought out in the Pitt report are that local knowledge and participation in alleviation of flood risk should be used, with technical support from the Environment Agency. Also that funding from all sources should be spent effectively, and that the work conducted by the Environment Agency is not always as transparent as it should be.

A major role of our Stakeholder Group is to help provide links between local people and the EA, to ensure that local knowledge and ideas can be injected into the planning process, and that proposed ideas from the EA can be presented and distributed.

We hope that these comments are of use in your consultation, look forward to seeing your final CFMP, and then following the subsequent reviews in the future.

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