

# Suffolk County Council's response to the Environment Agency's consultation on Managing Flood Risk at Minsmere – preferred option document Nov 2008

## Background

The Minsmere frontage under discussion stretches from Minsmere Cliffs in the north to Sizewell power stations in the south and stretches inland to Middleton along the Minsmere river valley and to Leiston Common. The area is at risk from both tidal and fluvial flooding. The Minsmere Levels are a natural flood plain taking river water from the Minsmere River (flowing in the New Cut) and holding it until the water can discharge through the sea sluice. Part of the site is managed by the RSPB to maintain suitable water levels for wildlife.

Deleted: a

Deleted: l

Deleted: is

Long term climate predictions indicate that weather extremes such as tidal surges will be increasingly likely in the future. This poses a more immediate risk than that from any predicted rise in sea level. The coast defences at the northern end of the site are particularly vulnerable and in 2006 and 2007 the sand and shingle ridges here breached and have already rolled back onto the secondary defence. It is expected that this natural roll back will provide a sustainable defence capable of withstanding normal tides and naturally repairing after minor breaches, although vulnerable to increased overtopping and breaching under storm conditions.

## Preferred Option for short term management of coastal defences

The preferred option proposed by the Environment Agency is to allow natural roll back of the primary defence. In the short-term it will involve the Environment Agency undertaking maintenance and minor repairs of the secondary defences. The existing embankment at Coney Hill will be improved to protect the majority of the area. However, overtopping and breaching north of Coney Hill, an area already under pressure, is likely to occur over the next twenty years, causing the North Marsh to become increasingly saline.

The preferred option is predicated on Natural England's assumption that the vegetative shingle banks are more important than the bittern-breeding reed beds of North Marsh – both being important, internationally designated habitats. On the basis of this assumption, the preferred option of raising Coney Hill bank to protect the majority of the RSPB site, and allowing natural roll-back of the primary sand and shingle bank is a realistic and acceptable proposal in the short-term to reduce the effects of coastal erosion and probable sea level rise.

However, the issue of public access and the continuity of the Suffolk Coast path between Dunwich and Sizewell in the long term must be resolved if changes to coastal management are to be fully acceptable to Suffolk County Council.

## Public Access/Suffolk Coastal Path

The Public Right of Way (Suffolk Coast Path) from Dunwich to Sizewell runs along the line of the current defences. In the long term, if regular and major breaches in the coast defences are to occur and the path is to be unusable, a new dedicated Right of Way will be needed. The Suffolk Coastal path is an important route for visitors and locals alike.

It has been suggested that this could run along the raised Coney Hill bank, through RSPB land around the edge of the marsh (not along the busy access road), and link into the existing footpaths on the National Trust land at Dunwich. An agreement to this principle is essential if the proposed coastal plan is to be acceptable to Suffolk County Council.

We understand there is willingness amongst all parties (EA, RSPB, National Trust and Suffolk County Council's rights of way officers) to discuss the details of creating such a diversion to the current route at an early stage.

The proposal to create bunds connecting the primary and secondary defences will cross the current public right of way. Careful consideration must be given to ensuring suitable public access across these bunds.

In the short-term we feel it is desirable to provide a temporary footpath diversion during any breaches to the defences. We suggest that the proposed new route outlined above could be put in place and used on a permissive basis until such times as it become the only viable and thus dedicated route.

We understand that the RSPB and EA are also discussing access within the reserve during the work to raise the Coney Hill wall.

### **Landscape**

The preferred option is expected to result in increased saline intrusion into North Marsh within the next twenty years or so, which will alter the habitat. Whilst this new habitat is unlikely to support breeding bitterns, we been assured that this will remain an interesting and valuable habitat and that it will not have a major impact on the visual landscape. As such this is an acceptable change.

### **Compensatory Habitat**

In line with European legislation, it will be necessary to provide compensatory habitat for the loss of North Marsh. Suffolk County Council requests that all attempts are made to provide this compensatory habitat as close to the area as possible – and within Suffolk if at all possible. The bittern is an iconic bird to the area and important in attracting visitors to Suffolk, thus contributing to the local tourism economy. However the compensatory habitat must be created on an area of existing low biodiversity interest, to avoid the replacement of one priority wildlife habitat with another; if this principle is not followed there will be a net loss in overall biodiversity value.

### **Sluice & Fluvial Flood Risk**

In the short to medium term, maintenance of the sluice (including rapid clearing of any shingle blockages) and New Cut are critical to adequate drainage of the land after periods of heavy rainfall, and must be assured. Close working between the local Internal Drainage Board and the Environment Agency is essential.

During the storm surges of 2006 and 2007 some overtopping of the outer dunes occurred but the landward bank was not breached and only limited salt water entered the RSPB reserve. However the blockage of the sluice by shingle prevented river water discharge for about ten days, leading to raised water levels in the levels – potentially very damaging to breeding wildlife.

At present the sluice operates under gravity. As sea levels rise it maybe necessary to consider options to pump the water away.

In the longer term, plans for the coast in the vicinity of the sluice *must* ensure there is a joined up strategy for coastal defence, the management of the sluice and the inland floodwater that flows through it. Any increase in fluvial flood risk to farmland, properties around Eastbridge and Middleton and local roads is not likely to be acceptable.

### **Archaeology and historic landscape**

The document rightly identifies the area as having considerable archaeological interest, including the presence of a Scheduled Monument (SM), known to be the site of Leiston Abbey; however, recognition of the importance of this site is not followed through the document. The SM lies within a broader area of interest, including a surviving area of early reclaimed marshland to the south which is of high historic landscape significance. An appreciation of the wider archaeological and historic landscape value of the whole area will need to be given full consideration in the next stage.



The impact of changing management on the area north of the SM needs to be assessed and monitored and historic environment issues will need to be given full consideration during the Strategic Environmental Assessment including early consultation with English Heritage (EH) and the Conservation Team of the County Council's Archaeological Service (SCCAS – CT). We further suggest that historic environment issues, encompassing the impact on archaeological deposits, standing structures and the historic landscape should be included as a Project Objective alongside nature conservation, land use and people, (page 7).

### **Highways**

There are four roads crossing the tidal floodplain for which Suffolk County Council are responsible which might be at risk of inundation if the current sea defences were to be breached. Most significant of these are the B1125 at Reckford Bridge and the U2822 Lovers Lane near Sizewell Belts. The U2822 is the designated access route to Sizewell Power Stations and is vital that this road is available for access to Sizewell Power Stations at all times - not only for the normal servicing of the Power Stations but also as the designated emergency route. The short-term preferred option of 'Partial Managed Realignment' appears to provide defence against flood risk for these roads and as such is an acceptable option.

A 'Do Minimum' option could, in time, result in risk of tidal inundation of these and therefore we could not support this option without a proper investigation of the impact on these roads. Assessment of the cost of any works required to ensure these roads remain serviceable is needed when determining longer term options.

### **Suffolk Shoreline Management Plan - long term plans**

The proposal is for the short-medium term and more work is needed to monitor the area and plan for the longer term, as part of the current review of Suffolk's Shoreline Management Plan.

The long term protection of Sizewell power stations – including ensuring access roads in the event of a tidal surge – will impact on plans for the Minsmere frontage.

We believe that protection of the remainder of the RSPB wetland reserve *in situ* should be the preferred option until technically impossible to achieve. This is an important component of Suffolk coastal tourism economy and a national asset that is not easily replaced.

Jane Burch  
Flood & Coastal Policy Manager  
Environment & Transport, Suffolk County Council  
01473 264782  
[jane.burch@et.suffolkcc.gov.uk](mailto:jane.burch@et.suffolkcc.gov.uk)

version 2: 30/01/09