

FROM THE CHAIRMAN OF THE YORKSHIRE REGIONAL FLOOD  
DEFENCE COMMITTEE

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To Leaders of Local Authorities in Yorkshire

14 May 2009

Dear Colleague,

**DISCUSSION PAPER ON THE 'IMPACTS OF CHANGES IN FLOOD AND COASTAL  
RISK MANAGEMENT ON RURAL COMMUNITIES'**

In recent years Government policy has increasingly focused flood defence resources on places where the risks and impacts of flooding are greatest. The Yorkshire Regional Flood Defence Committee (YRFDC) has been concerned that this will tend to concentrate resources on centres of population and wants to ensure that the rural dimension is not overlooked, or indeed the impact on small pockets of risk in urban areas.

At our meeting on 30 April 2009, we therefore considered a discussion paper on this subject from the Environment Agency's Regional Office. Members of the Committee were keen that the issues raised should be shared with all local authorities in the region, and accordingly I am enclosing a copy of the latest version of this paper.

The Agency is also in the process of developing policies on the withdrawal of maintenance from flood defence assets where, in the longer-term, such maintenance may not be economic. This is likely to be a more pressing issue in some of our rural areas.

The Committee will be considering its response to the Agency at our next meeting on 9 July, so it would be very helpful to have any comments your authority may wish to make on the paper by 19<sup>th</sup> June. Please return these to Simon Fogal ([simon.fogal@environment-agency.gov.uk](mailto:simon.fogal@environment-agency.gov.uk)).

I am sending a copy of this letter to your Chief Executive as well as organisations listed below

Yours sincerely,



Jeremy Walker  
Chairman - Yorkshire Regional Flood Defence Committee

## ***Environment Agency Yorkshire and North East Region***

### **Discussion Paper on the 'Impacts of Changes in Flood and Coastal risk Management on Rural communities'**

#### **1. BACKGROUND**

- 1.1 In common with other regions across the country, the Environment Agency's Yorkshire and North East Region is developing a number of strategies that address the management of flood risk in rural and urban areas. As the findings of these strategies have started to emerge and be implemented (as in the case of the Humber Strategy), there appear to be a number of potential adverse consequences for rural communities.
- 1.2 The Agency's future investments are likely to be principally directed towards the protection of people and properties. In the longer-term, it is likely to be difficult to improve defences protecting farmland at public expense, and it may become harder to fund maintenance. Furthermore, a number of potential schemes are being discussed for the protection of towns which involve creating flood storage washlands on farmland.
- 1.3 It is not just in relation to longer-term issues that there is concern. Aspects of the way we currently manage conservation, land drainage and coast protection may also impinge more seriously on rural areas.
- 1.4 Funding issues are central to this debate and the way that this evolves. We must therefore be sure that the approaches being used at present for allocating the funding are appropriate. For example, people living in rural areas are not always convinced that we value land correctly.

#### **2. THE STRATEGIC ISSUES CAUSING CONCERN FOR PEOPLE LIVING IN RURAL AREAS AND THE LOCAL AND POLITICAL REACTION**

##### **Withdrawal of maintenance and the 'non-improvement' of defences**

- 2.1 "Withdrawal of maintenance" is a relatively new concept. The Agency started looking at the issue in Essex where the costs for continuing to maintain long lengths of coastal defences were exceeding the benefits from the necessary investment. There is a formal policy in place for managing the withdrawal of maintenance from uneconomic coastal defences.
- 2.2 A draft national policy based upon the coastal policy has been developed and the principles within this are being considered for application in this Region as well as in other regions. It is possible that defences in the upper part of the River Hull floodplain may not be maintained by the EA in future because the costs for doing so may be too great compared with the benefits.
- 2.3 In relation to the Humber Strategy, there is a considerable proportion of the shoreline for which it may be unaffordable to improve the existing defence in the future to keep pace with expected rises in sea level. In some of the 'problem' areas, the floodplain is sparsely populated and, as a result, the economic case for improvement is unlikely to be sufficiently strong. For these lengths there may also

come a time when it will be uneconomic to maintain the defence, and so maintenance maybe withdrawn.

- 2.4 At Kilnsea in East Yorkshire, a new flood defence embankment has recently been built, with the costs met by the YRFDC, the local authority and local funding, after it became clear that the Agency was unable to fully fund the work at public expense. It is not the Agency's intention to fund future defence maintenance or improvements at Kilnsea.
- 2.5 In relation to the draft River Hull Strategy there is considerable local and political opposition to the preliminary findings. People living in the heavily populated areas will continue to be protected, but there are likely to be serious impacts in the rural parts of the floodplain. For example, thousands of hectares of agricultural land could become vulnerable to flooding as a result of withdrawal of maintenance if alternative solutions could not be found by relevant partners.
- 2.6 Where maintenance is withdrawn it might be an option for local people to take on the maintenance and improvement tasks themselves using a similar approach to that applied at Kilnsea. In this situation, the EA would work closely with local people and organisations to try to find a way of appropriately funding necessary maintenance.
- 2.7 A major study has been commissioned to consider the potential options for managing Sunk Island, which is the biggest of the future potential 'problem' areas around the Humber. A number of issues of potential concern for local people will be highlighted with the publication of the first of the study findings later this month.

#### **Managed realignment**

- 2.8 Substantial areas of managed realignment are being introduced within the Humber Strategy as a means for creating new habitat to meet losses resulting from generally maintaining the embankment system on its present alignment.
- 2.9 The Agency is legally obliged under the Habitats Regulations to replace any losses of European designated habitat resulting from "coastal squeeze".
- 2.10 The land that is needed for managed realignment is being bought from landowners on a negotiated basis where possible. The sites are adjacent to the estuary, and historically have been areas of wetland. They are in rural areas where the impacts on houses and infrastructure are minimised.
- 2.11 The next realignment site on the Humber is at Donna Nook, south east of Grimsby. The site has been acquired on a negotiated basis.
- 2.12 There is considerable local disquiet in the area around Donna Nook, but also on the north bank where more realignment is planned in the future. People are saying that land (and especially very good land) shouldn't be taken out of production at a time when food security is becoming an important issue, and that there is a disproportionate price being paid by rural landowners who are losing land to 'pay' for the protection that will continue to be provided to town and city dwellers.

#### **Flood storage**

- 2.13 Various sites have been identified in East Yorkshire as possible locations for flood storage. These are sites where infrequent tidal, fluvial, or surface water flooding can

be allowed to take place in a planned way to lessen the impacts that would otherwise be experienced elsewhere.

- 2.14 The way that such flood storage schemes would generally work is that the Agency would pay for the use of the land for flood storage on a predetermined basis. Generally, the Agency is unlikely to buy the land needed for these projects.
- 2.15 Site selection is expected to be on the same basis as for managed realignment: the locations are beside the rivers in places where impacts on houses and infrastructure are minimised.
- 2.16 There is very vocal opposition to the possible creation of a flood storage as an element of the draft River Hull Strategy, and it has to be expected that there will be similar opposition around the Humber if and when sites start to be considered as a means for managing water levels in the upper estuary during extreme events.
- 2.17 Flood storage tends to be seen as creating damage to rural areas for the benefit of townspeople.

### **3. CURRENT ISSUES CAUSING CONCERN FOR PEOPLE LIVING IN RURAL AREAS**

#### **Land drainage**

- 3.1 The Agency does not have a major direct involvement in land drainage (by which in this context we mean ...), this work is carried out by the Internal Drainage Boards, but with funding allocated by the Agency.
- 3.2 The Agency does however manage many of the major outfall systems and pumping stations that deliver drainage water into main rivers. In order for land drainage work to be carried out effectively, outfall systems need to be clear of debris and silt.
- 3.3 Land drainage work is mostly a rural issue.
- 3.4 There are frequent calls by landowners for the Agency to carry out more maintenance work on drainage outfalls and within river systems to allow land to be more effectively drained. There is a widespread feeling that the Agency puts less effort now into dredging and clearing than was the case in the past.

#### **River maintenance**

- 3.5 The Agency has powers to carry out general maintenance on rivers which have been designated as 'main river'. Powers in relation to 'ordinary watercourses' lie with Local Authorities or IDBs. Riparian landowners may also carry out maintenance works.
- 3.6 There is a statutory process for enmaining (i.e. redesignating as 'main river') sections of river. It is also possible to demain them where it is deemed no longer appropriate for the EA to oversee these sections. However, demaining may sometimes place additional financial burdens on rural communities.

### **Coastal erosion**

- 3.8 Under the Coastal Overview, the Agency now has a new role on the coastline as the principal strategic authority. This means that the Agency allocates funding for coastal schemes, and approves schemes and strategies promoted by local authorities.
- 3.9 The Agency is not responsible for the day to day on-the-ground management of coastal issues, but we will become increasingly drawn into the debates about how decisions are made to defend or not defend specific parts of the coastline. Schemes can only be progressed if there is a suitably strong economic case for investment.
- 3.10 The experience in the past has been that it has only been possible to make the case for protecting significant coastal towns and communities. It is not possible to make the case for protecting farmland or sparsely populated areas. There is no compensation for property lost as a result of coastal erosion.

## **4. ECONOMICS AND FUNDING**

- 4.1 Many of the decisions that affect rural communities are driven by the size of the annual budget made available to the Agency by Defra, and then on the systems used for allocating money from within that budget for individual schemes.
- 4.2 In the recent past, the Agency has used Defra's 'priority score' system for making investment decisions. Individual projects are scored according to the strength of the economic case, the number of people protected, and their environmental value. The maximum score that can be achieved is 44, though in practice it is difficult for any scheme to achieve a score in excess of 32. At present, schemes in the high 20s are being funded.
- 4.3 In the future, 'outcome measures' will be used. There are five measures that will be applied. There is a broader range of considerations than were used previously with priority scores.
- 4.4 Whether we are applying priority scores or outcome measures, the aim is the same: the systems allow decisions to be made on whether or not investment should take place. In many instances, however, 'good' schemes that might deliver a very positive return on the investment still don't make the grade because of the need to work within annual funding constraints. The issue becomes one of affordability.
- 4.5 Of the various issues set out in Sections 2 and 3 of this paper where there are concerns for people living in rural areas, most become problems as a result of the need to allocate the available funding in ways that deliver effective protection for the largest number of people. Withdrawal of maintenance, land drainage, river maintenance, and the lack of erosion protection in rural areas on the coastline may be driven by a potential inability to build a sufficiently strong economic case for investment because of the small number of potential beneficiaries.
- 4.6 Managed realignment and flood storage impinge on rural areas for related reasons. There is an underlying assumption that it is more acceptable to damage farmland and affect a small number of landowners than to affect larger communities.

## **5. WHAT SHOULD WE DO, WHAT CAN WE DO?**

- There is an obligation to work as effectively as possible within the existing funding and other constraints to provide rural communities with the most effective protection we can at public expense.
- The responsibility for managing flood risk should only be passed to local people when all avenues have been exhausted for funding the work from the public purse.
- The Agency should continue to work with Defra to increase the overall level of funding, with the aim that all schemes that are 'robustly economic' are funded from the public purse.
- We should actively work to more fully understand the importance of protecting farmland, and if appropriate, modify scheme assessment criteria to take greater account of its value.
- We should work closely with the Local Authorities to better understand the impacts of the Agency's work on rural communities.
- We should look more broadly at the impacts on rural communities of our maintenance operations.
- We should ensure that consideration of the issues associated with working with rural communities becomes a focus of attention for the Agency nationally.

## **6. RECOMMENDATIONS**

Comment is sought on the issues raised by the report and how these should be addressed.

**PHILIP WINN**  
**Humber Strategies Manager**

May 2009

Cc:  
National Farmers Union  
Country Landowners Association  
Natural England  
Yorkshire Wildlife Trust  
Yorkshire Forward  
Yorkshire Water  
IDBs Clerks