

Arun Valley flood risk management changes: a summary of consultation responses

Appendix D

Responses have been redacted to remove personal data.

Responder 7

customer service line 03708 506 506
incident hotline 0800 80 70 60

floodline 03459 88 11 88

Email : [REDACTED]

Our ref: [REDACTED]



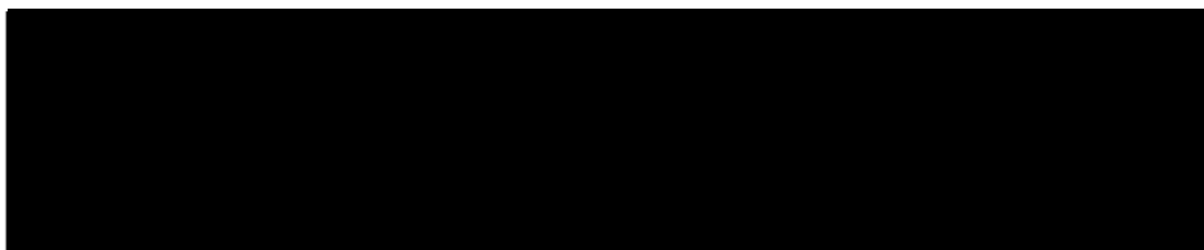
Mr R Long
Operations Manager (East)
Solent and South Downs Area
Environment Agency
Guildbourne House
Worthing
BN11 1LD

February 2020

Dear Mr Long,

**FLOOD RISK MANAGEMENT – RIVER ARUN BETWEEN PALLINGTON WEIR & PULBOROUGH
(LTRAS SU1) - CONSULTATION RESPONSE**

Further to your letter dated 30 September 2019 and the Arun Vision Meeting which we attended on 21st January 2020 on behalf of [REDACTED] and [REDACTED] this is our response to your decision to cease all flood risk management (FRM) activities within LTRAS SU1 with effect from the end of 2021.



We appreciate that the EA's prime concern is quite rightly to concentrate flood protection funds on people and properties, and we therefore accept that in SU1 there can be no question of investing Government money in expensive physical flood defences for the very minimal number of properties at risk of flooding both now and in the future. Also, we understand why the EA is loath to spend money to protect agricultural land from flooding.

However, having read both the 2014 LTRAS Report as well as 2019 "Vision for the Arun Valley" Report, we are concerned that the implementation of LTRAS will have a significant negative impact on the future management of the River Arun in SU1 between Pallingham Weir and Pulborough, all to achieve a saving of just some £1k pa. Over the years, the Estate has attended to fallen and

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dangerous trees in the river and has carried out some minor maintenance to the riverbank, informing the EA of blockages to the channel when necessary. However, with the EA now proposing to cease your 5-yearly inspection regime, and with some 20 separate landowners responsible for sections of the river banks within SU1, it is our view that the landowners will no longer have an effective means of managing the river as a collective group which, surely, is the only sensible way in which to approach our shared problems related to the river.

In particular, we are concerned about the anomaly presented by, on the one hand, the flooding that has occurred in the Pulborough area during the past month and, on the other hand, by the EA proposal to cease what little flood-related maintenance activities that are currently being carried out in SU1. We therefore question if it can possibly be right that you are still planning to cease flood-related maintenance in LTRAS Strategy Unit 1 at the end of 2021. It seems that the incidence of flooding and climate change-associated extreme weather events is pulling in one direction, whereas your money-saving proposals are pulling in the opposite direction.

Within the Estate there are [REDACTED] registered assets ([REDACTED] and [REDACTED]). Unfortunately, because of the recent bad weather we have been unable to inspect their condition, although we understand that your last asset inspection in March 2016 defined their condition as Grade 3 (Fair). However, that said, we have recently seen sight of your 2016 condition report relating to all the assets within SU1 and we note that there were a number of assets where routine maintenance work was recommended, but to our knowledge none of the SU1 landowners were informed of either their condition or the fact that they required maintenance.

It is perhaps therefore no wonder that there are currently differences in management across the various riverbank ownerships. Indeed, coupled with the almost total lack of information distributed to the landowners by the EA over the years, we are unsure as to just what effective management/maintenance has been undertaken along the river in SU1.

In our view, the fact that multiple landowners will be affected by the cessation of FRM activities in SU1, and given our comments above, we believe that the consequences of the EA proposal will lead to a total lack of co-ordination and thus effective river bank management action in the future. FRM has never been more important given the rainfall and climate change that we have all experienced in recent years. Instead, there would seem to be a strong case for the EA to be considering increasing its FRM activities and bolstering the current maintenance work. Indeed, with the continued housing developments in the area, both locally and especially further upstream in the catchment area, there is undoubtedly greater pressure on the river system and its assets than ever before. Whilst SU1 is itself less populated than further downstream, there are still a number of houses and commercial businesses in Pulborough which could be subjected to an increased risk of flooding as a result of your FRM decision.

Thus, because at present you are not actually maintaining the flood defences in SU1 and because we understand the need to avoid wasting your limited funds on unjustifiable maintenance activities, we believe that a far better approach would be for you to agree to

"Do Minimum" work rather than take the "Do Nothing" route that is recommended in LTRAS for SU1. The latter is likely to make the situation considerably worse than now because of the problems caused by the multiple ownership of the river banks and consequent lack of proper co-ordination, all in order to effect a saving of some £1k pa. It's just not sensible.

We therefore recommend that the LTRAS SU1 "Do Nothing" proposal should be put on-hold whilst you undertake a re-appraisal of the flood risks associated with SU1 and whilst you have a re-look at the way in which the results of your periodic inspections are shared with the riparian landowners. Flood risk in this section of the tidal River Arun will undoubtedly increase in the future, and we believe that for a tiny residual annual expenditure from your maintenance budget you should be able to help to offset the adverse impacts of future climate change and sea-level rise as they begin to bite in SU1.

Finally, whilst we understand the funding pressures that the EA is under, we would ask that you strongly consider commissioning an early and comprehensive report of the state of the river in SU1 which can then be presented to a joint meeting of the riverbank owners for a discussion as to how the food risks in SU1 of the River Arun could be best managed in the future.

Please feel free to contact [REDACTED] or [REDACTED] if we can be of any further assistance.

Yours faithfully

[REDACTED]

[REDACTED]

[REDACTED]

Responder 8

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Mr R Long
Operations Manager (East)
Solent and South Downs Area
Environment Agency
Guildbourne House
Worthing
BN11 1LD

28th February 2020

Dear Mr Long

**FLOOD RISK MANAGEMENT – RIVER ARUN BETWEEN PALLINGHAM WEIR & PULBOROUGH
(LTRAS SU1) - CONSULTATION RESPONSE**

On behalf of [REDACTED] of [REDACTED] please accept this response to your letter dated 30 September 2019 regarding the decision to cease all flood risk management (FRM) activities within LTRAS SU1 with effect from the end of 2021.

[REDACTED]

The farm buildings [REDACTED] were close to flooding in 2013 and also this year. The access road from [REDACTED] to Pallingham Quay floods every year rendering the access impassable.

For your information [REDACTED] owns the western bank of the River Arun from the weir at the northern most point of the SU1 and south to the area adjacent to the woodlands known as "Rumbeam Copse".

We appreciate that the EA's prime concern is quite rightly to concentrate flood protection funds on people and properties, and we therefore accept that in SU1 there can be no question of

CLM – Land and Rural Property Management

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Registered Office: As above. Company Reg No: 9317485. VAT number: 826 8774 80

investing Government money in expensive physical flood defences for the very minimal number of properties at risk of flooding both now and in the future. Also, we understand why the EA is loath to spend money to protect agricultural land from flooding.

However, having read both the 2014 LTRAS Report as well as 2019 "Vision for the Arun Valley" Report, we are concerned that the implementation of LTRAS will have a significant negative impact on the future management of the River Arun in SU1 between Pallingham Weir and Pulborough, all to achieve a saving of just some £1k pa. Over the years, the Estate has attended to fallen and dangerous trees in the river and has carried out some minor maintenance to the riverbank, informing the EA of blockages to the channel when necessary. However, with the EA now proposing to cease your 5-yearly inspection regime, and with some 20 separate landowners responsible for sections of the river banks within SU1, it is our view that the landowners will no longer have an effective means of managing the river as a collective group which, surely, is the only sensible way in which to approach our shared problems related to the river.

In particular, we are concerned about the anomaly presented by, on the one hand, the flooding that has occurred in the Pulborough area during the past month and, on the other hand, by the EA proposal to cease what little flood-related maintenance activities that are currently being carried out in SU1. We therefore question if it can possibly be right that you are still planning to cease flood-related maintenance in LTRAS Strategy Unit 1 at the end of 2021. It seems that the incidence of flooding and climate change-associated extreme weather events is pulling in one direction, whereas your money-saving proposals are pulling in the opposite direction.

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It is perhaps therefore no wonder that there are currently differences in management across the various riverbank ownerships. Indeed, coupled with the almost total lack of information distributed to the landowners by the EA over the years, we are unsure as to just what effective management/maintenance has been undertaken along the river in SU1.

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considering increasing its FRM activities and bolstering the current maintenance work. Indeed, with the continued housing developments in the area, both locally and especially further upstream in the catchment area, there is undoubtedly greater pressure on the river system and its assets than ever before. Whilst SU1 is itself less populated than further downstream, there are still a number of houses and commercial businesses in Pulborough which could be subjected to an increased risk of flooding as a result of your FRM decision.

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Yours sincerely

[Redacted signature block]

[Redacted line]

[Redacted line]

[Redacted line]



Responder 9

customer service line 03708 506 506
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[REDACTED]

All correspondence to:

[REDACTED]
[REDACTED]
[REDACTED]

Tel: [REDACTED] (Mob)
[REDACTED] (Office)
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Fax [REDACTED]
VAT No [REDACTED]

Mr R Long
Operations Manager (East)
Solent and South Downs Area
Environment Agency
Guildbourne House
Worthing
BN11 1LD

Dear Mr Long.

FLOOD RISK MANAGEMENT- RIVER ARUN (LTRAS SU1) RESPONSE

In response to your letter dated 30th September 2019 [REDACTED]

[REDACTED] we are would like to put forward our response to your decision to cease flood risk management (FRM) within LTRAS SU1 from the end of 2021.

[REDACTED] runs along the River Arun, all within SU1 for about a mile, [REDACTED]

[REDACTED] Managing stock on this area becomes very difficult when flooded and has an impact on our annual income. We have also recently had a property cut off from the excessive flooding.

We do understand the EA have to channel their funds towards more populated areas and SU1 does not come into that category as there are few property's at risk within this area. With this in mind the 2019 Vision for the Arun Valley is, in our opinion, negative as far as future Management between Pallingham Weir and Pulborough to save little more than £1k pa. We have as a farm managed what we can safely do to move or take down any trees and debris disturbed by the flooding. This has however been very difficult to do and can only happen when we have dry conditions. On a recent incident we had a large tree fall across

the River, the EA were informed on numerous occasions in November and December (incident number [REDACTED] yet there's been no reply to what could be a very serious hazard if this tree washed down to the bridge.

Within the SU1 area there are a lot of different land owners the majority being owned by non-farmers who have no means of managing river banks. The increase of flooding and the decision to end maintenance in SU1 must surely be a negative move on the future of this area coupled with seemingly more rain fall and the ever increasing large scale housing up river.

We understand the inspections are carried out every 5 years yet we rarely see, if at all, any maintenance or inspections are being carried out along the River and no correspondence from the EA as to when these visits occur or what if any actions need to happen. We would like to see a record of what works/inspections have been carried out in recent years and have any of the other 20 or so land owners had any inspections on their river banks within SU1.

Are there any flooding strategies further along the river in place to ease pressure when flooding in our area and around Pulborough as the impact it has on the Village and the closure of major trunk roads is so disruptive on businesses far and wide?

Looking forward and given our views above on the area in SU1 with the FRM activities cessing from 2021 we cannot see how ongoing management will happen given that there are so many landowner's within this area. Surely managing this area in the future under the EA will help maintain and communicate with all landowners in SU1. This situation is only going to get worse with increased flooding and Climate Change.

We therefore recommend the "do nothing" proposal should be put on hold until a re-appraisal of the flood risk area and the results are shared with the landowner's at a joint meeting for discussion on the future flood risk management of the area in SU1.

Yours Faithfully

[REDACTED]
[REDACTED]
[REDACTED]