

# Managing flood and coastal erosion risk for the Exe Estuary

Consultation Report

May 2013

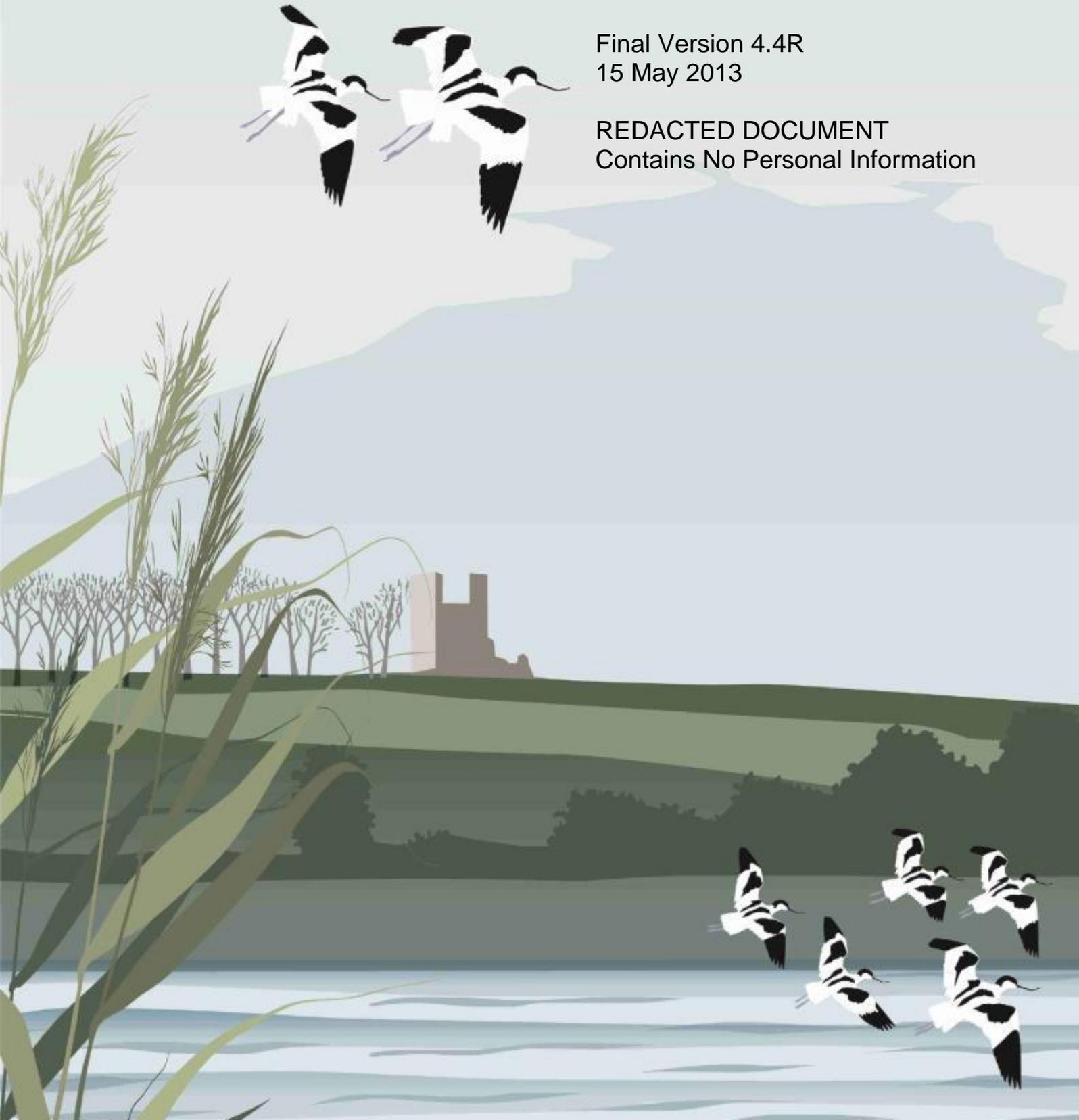


# Exe Estuary Flood and Coastal Erosion Risk Management Strategy

## Consultation Report

Final Version 4.4R  
15 May 2013

REDACTED DOCUMENT  
Contains No Personal Information



# Exe Estuary Flood and Coastal Erosion Risk Management Strategy

## Consultation Report

**May 2013**

### Notice

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### Document History

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V2	Draft Consultation Report Includes data analysis	RJH				6 Mar 13
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### Note:

This document has been redacted to remove reference to personal information.

The names of organisations can be viewed, but not the names of the individual employees/officers who have responded.

The names of elected representatives can be seen where they have responded in this capacity.

## 1 Summary

The draft Exe Estuary Strategy recommends how we should manage flood and coastal erosion risks. It identifies appropriate measures to deliver agreed policies. The Strategy area comprises the whole of the Exe Estuary, from Exmouth and Dawlish to Exeter, including adjacent coastline. This Strategy needs to be sustainable in the future and therefore considers the next 100 years.

The recommendations have been developed under the stewardship of a Steering Group which includes the Local Authorities, Network Rail and Natural England, representing the diverse interests that need to be taken into consideration. Getting this far has involved technical and environmental assessment and liaison with many organisations and individuals. Before the draft Strategy is recommended for adoption by the authorities who will deliver it, and approval at a national level which will secure funding, we have widely sought views on our findings and recommendations. In particular, a period of open consultation was held between 21 January and 4 March 2013.

Views were sought during the consultation period through media that included a prepared questionnaire, email and an online e-consult site. Environment Agency staff and their consultants were available at three drop-in exhibitions held in Dawlish, Topsham and Exmouth and at several public meetings.

In total 125 responses were analysed, comprising 35 completed questionnaires, 6 letters and 84 emails. An additional 29 items of correspondence include emails and requests for information that arrived after the closing date.

Almost two thirds (63%) of responses related to the Lower Clyst Valley; between the communities of Clyst St Mary, Topsham and Clyst St George. Most of these responses raise objections to the draft Strategy recommendations for this area. The main concerns relate to believed increases in flood risk to the road, effects on farmland/local businesses and cost.

In addition to the direct responses to the draft Strategy Consultation, two petitions have also been forwarded. One of these was led by Darts Farm and gathered 417 names; the other 32 names. Some of the signatories have responded separately. These campaign petitions demonstrate a significant strength of local feeling.

Of the 125 responses received, 16% support the draft Strategy, 68% object to some aspect and 16% were undecided or did not express a view. However, outside of the Lower Clyst Valley, there were few concerns raised. Only two responses do not support the draft Strategy for reasons that are not explicitly related to the Lower Clyst Valley.

The Environment Agency and its partners in the Strategy have considered all the responses and the need for amendment to the draft Strategy. The Strategy Steering Group has concluded that:

- there are no major public concerns about the draft Strategy outside of the Lower Clyst Valley;
- changes should be made to the recommendations for the Lower Clyst Valley;
- other minor clarification and amendment to the Strategy reports are needed to address points raised during the consultation, but these do not affect the overall findings and recommendations;
- with these changes, the draft Strategy should be submitted for adoption/support/approval.

Most of the recommendations in the draft Strategy remain unchanged and so improvements to flood defences at Dawlish Warren, Exmouth, Topsham, Starcross and Powderham Banks (near Exminster) will be progressed at the earliest opportunity. Proposals to create habitat on the east bank of the River Clyst by Darts Farm have, however, been withdrawn. Proposals for the west bank of the River Clyst remain with an assurance that monitoring will be put in place to assess the condition of the bridge and banks in the area.

## 2 Background to the draft Strategy

In the past, most flood and coastal defence work has been reactive, often in response to a major flood or storm. A Strategy plans ahead so that we can anticipate risks before they occur. We need to do this, more now than ever before, because of the impacts of climate change including higher sea levels which will increase the risks of flooding and coastal erosion. It is also important to plan ahead for both the national and local investment that will be needed to fund new work.

This is an area where many people live, work and play. It is also a home to highly significant natural features and wildlife; much of the Exe Estuary has international, European and national designations for its natural habitats and wildlife. We need to have regard to all these interests and ensure that we protect what is most valued. Some things may have to change but we can still try to make these changes positive ones.

The shoreline management policies that we are following are set out in the South Devon and Dorset Shoreline Management Plan (SMP) which was finalised in June 2011. This plan concluded that we should continue to defend most of the developed coastline, although we might need to move or alter some defences. It also recognises the uncertainty about how some areas, in particular around Dawlish Warren, will evolve. The Strategy is needed to enable these policies to be developed and then delivered.

This Strategy is being developed by the Environment Agency in partnership with other organisations which share coastal interests in the area. These include the local authorities of Devon County, Teignbridge, Exeter City and East Devon. Natural England and Network Rail are also closely involved. However participation in the development of the Strategy is not limited to these organisations and contributions have been welcomed from any organisation or individual with an interest. This approach has been taken to ensure that the Strategy is widely understood and jointly supported.

The Strategy area comprises the whole of the Exe Estuary, from Exmouth and Dawlish to Exeter, including adjacent coastline between Holcombe and Sandy Bay (Straight Point).

Stages leading to the draft Strategy have comprised:

- Collection of baseline information and analysis, including descriptions of the strategy area, its historical development, the physical processes that are shaping it, flood and coastal defences and risks, and an economic valuation of what is at risk.
- Consideration of high level options to manage the risks.
- Evaluation of specific measures that will be needed, particularly in the short term.
- Assessment of the environmental impacts of the Strategy, in particular to ensure that the special interests are protected.

These stages drew to a conclusion around the end of 2012, when the Steering Group was able to make its recommendations for the draft Strategy. The following period of public consultation has been important both to establish the level of support and the need, if any, for revision before the Strategy is presented for adoption by operating authorities and approval (for funding).

The Strategy needs to be sustainable in the future and therefore covers the next 100 years. Strategy actions focus on the short term (before 2030) since we have most certainty about the near future and need to plan now for these works. Our recommendations for the medium and long term (after 2030 and 2060 respectively) are based on the best available information, but will be regularly reviewed to take account of changes.

### 3 Consultation for the draft Strategy

We held a public exhibition in Exeter in September 2010 to launch the Strategy. Individuals and organisations with an interest have subsequently been kept informed.

The Steering Group representing the main elected and other statutory interests has met regularly to consider each stage of Strategy development. Individual meetings have been held with members of the Steering Group, as necessary.

As the findings and direction of the draft Strategy emerged, wider engagement with elected representatives, landowners and local organisations has been undertaken. We held a meeting in October 2012 to inform invited stakeholders of progress and to seek their views. Information, including fact sheets, has also been forwarded to stakeholders and made available on the Environment Agency website: [www.environment-agency.gov.uk/exe/estuary](http://www.environment-agency.gov.uk/exe/estuary)

The 'Living with a Changing Coast' (LiCCo) project is running alongside the Strategy in the Exe Estuary area. This part European funded project is helping coastal communities understand, prepare for and adapt to future changes to the coastline. The LiCCo project is working with parish councils, schools and other community groups to raise awareness and to encourage participation in decision making. In the Exe Estuary, the project is hosted by the Environment Agency with support from the Exe Estuary Management Partnership, based at Devon County Council. LiCCo officers have attended several public meetings where development of the Strategy has been discussed and supporting materials are available at the website: [www.licco.eu](http://www.licco.eu) This project will continue until September 2014.

The period of public consultation ran from 21 January to 4 March 2013. We informed 450 individuals and organisations, with an interest in the draft Strategy, directly or through the Exe Estuary Management Partnership. The consultation was also advertised in local newspapers with particular reference to the environmental report. Press releases were issued, posters were widely distributed using community contacts and banners were placed in supermarkets, leisure centres and local council offices to raise awareness about the consultation. We gave a number of interviews to local TV and radio.

We summarised the draft Strategy in a 28 page Consultation Document, available in electronic and paper form as a 'plain English' style brochure. This provided an overview of the Strategy and described what is at risk, our recommendations and other considerations for each of the 12 units that comprise the Strategy area. The document also provided details on how to find more information and how to submit views on the draft Strategy. These included an automated e-consultation site, which also provided access to the full technical reports, and a questionnaire. Copies of the Environmental Report were available to be viewed at Council and Environment Agency offices during the consultation period.

Three open 'drop-in' exhibitions were held as follows:

Monday 21<sup>st</sup> January : 5pm – 8.30pm, Dawlish Community College  
Monday 28<sup>th</sup> January : 1pm – 6pm, Topsham Matthews Hall  
Wednesday 6<sup>th</sup> February : 12 noon – 6pm, Exmouth Pavilion

Display material at these events included maps, charts and a film. Factsheets and 'frequently asked questions' (FAQ) were also available to read or take away. Staff from the Environment Agency and partner organisations were available to answer questions and explain the ways in which comments could be submitted.

In total, over 400 people attended the drop-in events. Separate public meetings were attended by a LiCCo project officer and Environment Agency staff, in response to requests from local communities. These have included meetings at Starcross, Dawlish, Dawlish Warren, Clyst St Mary, Kenton and Topsham.

## 4 Analysis of consultation responses

### Introduction

The public consultation period ran from 21 January to 4 March 2013 inclusive (6 weeks). We invited comments on the draft Strategy through a variety of routes including the Environment Agency's e-consult website, prepared questionnaire (electronic and hand-written versions), letter and e-mail.

<b>Form of response:</b>		
Questionnaires	35	of which 19 were by e-consult
Letters	6	
Emails (including some arriving after the closing date)	91	
Other Correspondence	22	requests for information etc

It should be noted that some responses were on behalf of more than one person and some people responded in more than one way.

### Level of support

The questionnaire sought an indication of support for the areas of the draft Strategy that are of interest. Where this was not given, a view has been taken whether the response is neutral/undecided or should be regarded as an objection. If in doubt, or where significant concerns are raised, the response has been counted as an objection. Emails have also been analysed where sufficient information was provided; some correspondence sought information or did not provide sufficient detail for analysis. 125 responses, out of the total of 154 (i.e. 81%) have been analysed further.

<b>Level of support:</b>		
Supporting	19	16%
Neutral/Undecided	19	16%
Do not Support	87	68%
<b>Total</b>	<b>125</b>	<b>100%</b>

### Locations where the Strategy recommendations were not supported

The consultation document considers the Strategy area as twelve separate geographical units. Objections are attributed to these units as follows:

<b>Locations where Strategy recommendations were not supported:</b>		
East and West Clyst (Lower Clyst)	85	98%
Topsham/Countess Wear/ Exminster Marshes	1	1%
Dawlish Warren sand spit	1	1%
Other	0	0%
<b>Total</b>	<b>87</b>	<b>100%</b>

### General/individual concerns

Individual concerns (other than the Lower Clyst Valley) relate to the following:

- Fluvial/combined flood risk in Lympstone
- Wildfowling interests
- Implementation details in Topsham
- Implications of changes to Dawlish Warren sand spit
- Whether habitat compensation measures are sufficient
- The need for dredging the estuary entrance
- Fluvial flood risks to Clyst St Mary

## 5 Comments and concerns with respect to the Lower Clyst Valley

### Reasons for concern

85 objections relate to the recommendations applying to the Clyst Valley, where some managed realignment is recommended to create intertidal habitat. A further 8 responses also raised concerns (not amounting to objection) with respect to this area and so a total of 93 responses have been analysed further.

The aim of this further analysis has been to understand the main issues of concern. This involves some interpretation as many of the responses are not in a standard form. The main issues of concern have been identified and the number of references to these has been noted.

<b>Area of concern (based on 93 responses):</b>		
Effect on the C527 road (additional flooding)	36	39%
Loss of farmland/ local economy/ food security	33	35%
Cost	24	26%
Need is unproven (poor science/evidence)	17	18%
'Birds before people'	12	12%
Change to landscape	10	11%
Increased risk of property flooding or erosion	9	10%
Fluvial risks are of greater importance than tidal	6	6%

Note that some responses raised several concerns whilst others objected without giving a reason. Hence the totals do not add up to 93 and 100%.

### Particular points to note in relation to the top three concerns

- **Effect on the road**

Many of the responses use terms such as 'removing the road', 'loss of the road', 'eradicating a road' or 'erasure of a roadway' even though that is not what is proposed by the draft Strategy. The responses represent a widely held view that the draft Strategy recommendations will increase the risk of flooding to the road, which is universally seen as a vital route.

- **Loss of farmland/local economy**

A number of responses challenge the view, and are affronted by the suggestion, that the agricultural land is unproductive and raise concerns about a reduction in local food security.

- **Cost**

There are a number of references to costs of £8-10m in this area, which is regarded as excessive, even if used to safeguard the road. This may partly be because the road is believed only to need safeguarding as a consequence of the draft Strategy.

### General Observations

It appears that many of the claims, objections and concerns have not resulted from the information in the draft Strategy consultation documents but from the 'Save the Clyst' campaign that has been run in opposition to the Strategy and included a call for objections. Few responses refer to the draft Strategy but use terms such as 'Lower Clyst Project', relating to previous initiatives.

Separate petitions opposing the draft Strategy have also been forwarded. One of these was led by Darts Farm and gathered 417 names; the other 32 names. Some of the signatories have also responded separately through the public consultation.

## 6 Responses to Comments and Concerns

Specific questions and requests for information have been answered through direct reply by the Environment Agency.

All the comments and concerns have been seen and considered by the Strategy Steering Group. Views have been sought from our consultants and partners to the Strategy, where appropriate.

Revisions will be made where comments relate to the need for clarification or correction of information within the Strategy reports.

'Frequently asked Questions (FAQ)' and their answers were made available during the public consultation period. These were based on engagement with stakeholders during development of the draft Strategy and can be found in the Appendix B to this report.

The overwhelming majority of comments and concerns received during the public consultation relate to the Lower Clyst Valley. These have been considered and responses to the main points are provided below:

***'The risk of flooding and disruption to the C527 road connecting Clyst St George with Topsham will increase as a result of the Strategy.'***

The road crossing the floodplain is currently at risk of flooding caused by high river flows and by extreme tide conditions. We expect these risks to increase in the future due to the impacts of climate change. The recommendations identified in the draft Strategy **will not increase the risk of flooding to the road, buildings or other infrastructure** and any proposed works would not go ahead unless this can be ensured. There is limited funding available for improving the protection to the road, but there could be an opportunity to increase the likelihood of funding if improvements are linked to intertidal habitat creation on the east bank of the river. Devon County Council, the Environment Agency and partners will continue to work together to seek a long term solution to manage the increase in flood risk to this important asset.

***'Flooding of farmland will be imposed on landowners.'***

The Environment Agency has always made it clear that it will not do this. Areas of new habitat will only be created where landowners agree to work with us to achieve this in a jointly acceptable way. Landowners working with us will receive financial recompense for land that is part of a managed habitat creation scheme. Change will be gradual, the land will initially only be affected on a limited number of high spring tides each year and so some agricultural use may still be possible. In the Lower Clyst valley, the Environment Agency has already withdrawn maintenance on a number of embankments that protect farmland and therefore flood risk to these areas will increase in the longer term. It is reasonable therefore that landowners affected have the opportunity to manage their land differently. Entering into an agreement to create intertidal habitat gives landowners an opportunity to do this.

***'The loss of farmland will impact on food security'***

Agricultural land in the Clyst Valley is generally classified as Grade 4 or 'poor quality' which means that it is generally suitable for grass but not for crops. Recommendations in the draft Strategy would involve flooding a small proportion of the Clyst Valley to create up to 21 hectares of habitat, by allowing high spring tides into a number of fields which might still be used for agriculture (e.g. grazing by salt marsh lamb).

As a comparison, the total area of farmland lost in the UK as a result of managed realignment (habitat creation) since 1991 is about the same as the amount lost to development in the UK every year.

***'The proposals cost a huge amount and are a waste of public money'***

The cost of not investing in our coastal defences, and associated measures to mitigate environmental impacts, is very much higher. The value of damage that would occur around the estuary, if works were not progressed to manage the increasing flood risks, has been estimated at £868million at today's prices over the life of the Strategy.

***'Measures to create habitat are being proposed before the need is proven and before works to protect people.'***

In most cases, by creating intertidal habitat there will be a restoration of the original habitat, as many low lying areas around the estuary used to be coastal marsh before they were drained for farming. By waiting for intertidal habitat to be lost there would be a deficit whilst new habitat develops. This takes several years during which the special value of the estuary would decline. We are not seeking to provide new habitat before it is needed.

***'The Strategy is putting birds before people.'***

In most areas, the draft Exe Estuary Strategy recommends the maintenance or improvement of existing coastal defences that protect people, their properties and businesses. As sea levels rise, designated intertidal habitat in front of these defences will be lost due to coastal squeeze. The Environment Agency and other authorities have a legal obligation under the Habitats Regulations to replace this lost habitat. The recommendations in the draft Strategy to create intertidal habitat is a consequence of having coastal defences that protect people. There is a risk the recommended works to manage these defences would not proceed or would be delayed until these requirements can be met. Consequently risks to coastal communities would increase, with greater likelihood of damage and the need for emergency rather than planned action.

***'We should not be changing land which clearly provides habitat for wildlife (such as grazing wintering geese) when there is already enough intertidal habitat in the estuary.'***

We have used the best available information, and sought advice from our partners including Natural England, to determine what measures are needed to maintain the overall integrity of the Special Protection Area which supports internationally important bird species. This special area will be affected by the defences that benefit homes, businesses and the environment around the whole estuary, unless action is taken.

## 7 Revisions to the Draft Strategy

We recognise the strength of concern and feeling with respect to the draft Strategy for the Lower Clyst Valley. These measures were recommended because there is a need to create intertidal habitat to compensate for losses due to coastal squeeze, caused by existing or proposed coastal defences, to the Exe Estuary Special Protection Area (SPA). The lower Clyst Valley has been identified as one of the most suitable locations in the Exe Estuary to create this habitat.

The main issues are the need for (and cost of) works to prevent an increased risk of flooding to the C527 road across the floodplain and loss of farmland associated with the recommendation to realign defences on the east bank. Furthermore, landowners on the east bank of the river are not now agreeable to the creation of inter tidal habitat on their land.

We will therefore not now proceed with the recommendation to create habitat on the east bank of the River Clyst and will include additional assurances to allay concerns over any increased risk of flooding or erosion as a result of the recommended habitat creation on the west bank of the River Clyst. Consequently we have revised the draft Strategy recommendations as follows:

### **East Bank of the River Clyst**

The draft recommendation for the east bank of the River Clyst was ***'...for the realignment of some existing embankments before 2030 to create new intertidal habitat. This could be achieved by creating a breach or breaches in some embankments'***.

The revised draft Strategy recommendation is now:

***'... to continue the existing position on maintenance of embankments and outfalls in the Clyst Valley, where these assets protect highways or other infrastructure in addition to agricultural land, in the short term or until alternative measures are decided. In most cases it will not be possible to continue to maintain these defences in the longer term due to sea level rise and we will look at ways to manage this change.'***

***Although there is currently insufficient economic justification to increase the standard of protection to the C527 road, Devon County Council, the Environment Agency and partners will continue to work together to seek a long term solution to manage the likely increase in flood risk to this important asset, including monitoring the expected increased river and tidal flows and their effect on downstream highway infrastructure. Depending on relevant permissions and landowner agreements such long term solutions to reduce the likely increase in flood risk to the road could be combined potentially with habitat creation, thus opening the opportunity to access central government funding.'***

### **West Bank of the River Clyst**

For the west bank the recommendation was ***'to realign some defences... within the next five years, by locally breaching embankments in agreement with local landowners, to create new intertidal habitat. Local resilience measures at one property would ensure no increase in risk to residents.'***

This recommendation will now include:

***'The physical condition of the local embankments and structures will be monitored and, if necessary action taken, to ensure that there is no increased risk of flooding or erosion damage to property or to the road as a result of these measures.'***

### **Other Areas**

No changes are proposed for the recommendations covering other areas of the draft Strategy.

The (revised) draft Strategy would remain generally in accordance with the agreed Shoreline Management Plan (SMP).

## 8 What Happens Next?

The Strategy Steering Group, representing the main authorities with an operating or other significant interest, has considered responses to the public consultation and made any changes to the draft Strategy it considers necessary. A Strategy Appraisal Report (StAR) will consolidate the main findings from the draft Strategy reports, including the principal recommendations with any amendments.

The next step is to submit the StaR for formal adoption by the operating authorities. These comprise the local authorities and the Environment Agency which have the statutory powers to manage flood and coastal risks. These authorities will lead delivery of the individual actions that comprise the Strategy.

The StaR will then be submitted to the Environment Agency at a national level. National approval of the Strategy is necessary in order for individual schemes to be considered for central Government funding, since the Environment Agency distributes of this on behalf of the Department for Environment, Food and Rural Affairs (Defra).

Any statutory consents will need to be obtained before the Strategy is fully approved. These relate, in particular, to compliance with environmental legislation including the Strategic Environmental Assessment (SEA) and the Habitats Regulations.

There are no plans to revise the Environmental Report, based on responses received. Those that have an environmental aspect are summarised and considered in the Statement of Environmental Particulars.

Where amendments to the Shoreline Management Plan (SMP) are required, this will need to be approved by the relevant Coastal Group.

# Managing Flood and Coastal Erosion Risk for the Exe Estuary

## *“Your chance to comment on the draft Strategy”*

**1 Please indicate which sections you are interested in (tick all that apply):**

- The whole Estuary, or select from the following
- Sandy Bay
- The Maer, Exmouth,
- Exmouth
- Courtlands to Exton including Lymphstone
- East Bank of the River Clyst
- West Bank of the River Clyst
- Clyst St Mary
- Topsham, Countess Wear and Exminster Marshes
- Powderham Banks and the Kenn Valley
- Starcross and Cockwood
- Dawlish Warren
- Dawlish town to Holcombe

**2 Do you think that the draft Strategy deals adequately with the risks to:**

- |                                 |                              |                             |                                     |
|---------------------------------|------------------------------|-----------------------------|-------------------------------------|
| <b>People?</b>                  | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Don't know |
| <b>Businesses?</b>              | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Don't know |
| <b>Amenities (eg beaches)?</b>  | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Don't know |
| <b>Road and rail transport?</b> | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Don't know |
| <b>The environment?</b>         | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Don't know |

If you think that we have missed something please explain what.

.....

.....

.....

**3 We have tried to be thorough and clear. Do you think we have adequately considered all the important issues?**

- Yes       No       Don't know

If you have ticked 'No' or 'Don't know' please explain why.

.....

.....

.....

**4 Do you support the Strategy recommendations for the area(s) of the estuary you are interested in?**

- Yes       No       Don't know

If you ticked 'No' or 'Don't know' please explain why.

.....

.....

.....

**5 Do you have any further comments on the Strategy that you would like to be considered?**

.....  
.....  
.....

**6 Do you have any comments on the Environmental Report?**

.....  
.....  
.....

**7 Would you like to be kept informed as the Strategy progresses?**

Yes  No

**8 Would you like your response to be kept confidential? (Please tick one box)**

Yes  No

-----  
***For inclusion on the printed version only (not e-consult):***

**Your Name** .....

**Address** .....

.....

.....

**Postcode** .....

**Email address** .....

Throughout the consultation we will make all comments (apart from personal information) publicly available on the Environment Agency website. This includes comments received online, by email, post and by fax, unless you have specifically requested that your response be kept confidential. Only names of organisations that respond and not individuals will be published.

If you provide an email address, you will receive an acknowledgement of your response. After the consultation has closed a summary of the responses will be published on the Environment Agency website. We will let you know when this is available.

Under the Freedom of Information Act 2000, we may be required to publish your response to this consultation, but will not include any personal information. If you have requested your response be kept confidential, we may still be required to provide a summary.

You can find an automated e-consultation <https://consult.environment-agency.gov.uk/portal/>

This questionnaire is also on our website [www.environment-agency.gov.uk/exe/estuary](http://www.environment-agency.gov.uk/exe/estuary)

Please hand in your completed copy of this questionnaire or you can post it, or send your comments to:

Exe Strategy,  
Martin Davies,  
Environment Agency,  
Manley House,  
Kestrel Way, Sowton,  
EXETER, EX2 7LQ

**Please ensure that we receive your comments by 5pm on 4 March 2013.**

## EXE ESTUARY STRATEGY:

### FREQUENTLY ASKED QUESTIONS

#### Climate change impacts and predicted sea level rise

**1. What is the likely level of future sea level rise around the Exe Estuary and how confident are you that these predictions are correct?**

We have good confidence in the likely sea level rise over the next twenty years which is estimated as 100mm. By 2050, there is also confidence that we could experience over 200mm of sea level rise. Predictions vary because we don't know how many greenhouse gases will be emitted in the future and estimates suggest a range of sea level rise between 400mm and 1.7m over the next 100 years. The best estimate that is used in the strategy is that sea levels will rise locally by 700m by 2110. Ongoing local monitoring and forecasting will provide us with more evidence and if necessary the Strategy can be reviewed in the future to reflect any changes.

**2. I have heard that storms are predicted to get more severe and to happen more often – but just how much worse and more often is likely?**

Increases in wind speed, wave height and surge during storms are likely as a result of more energetic weather systems associated with climate change. However, it is difficult to quantify these changes based on current evidence.

**3. What is the impact of strong winds on calm sea water levels in the Exe Estuary?**

In addition to the effects of waves themselves, strong winds cause waves which can raise still water levels within the estuary by up to 0.1m. On the open coast this effect can be much greater. Low air pressure associated with high winds can also raise sea levels generally, resulting in tidal surge. These conditions are more likely to lead to wave overtopping of sea defences and coastal erosion.

#### Clyst Valley

**4. What will happen to the Topsham to Clyst road if farmland is flooded in this area – won't it cause increased disruption to local residents and businesses?**

We have been working closely with Devon County Council and other Environment Agency departments to confirm there would be no increase in flood risk to property or infrastructure, including to the road, if a large area of new habitat is created just upstream of the bridge. It is guaranteed that this potential risk would have to be mitigated before any permission would be granted. We are looking at options to improve flood protection to the road if and when a large area of new habitat is created in this area. This could be done by raising the road on a causeway or building new embankments. It is likely that improved protection to the road would only happen as part of a package of works in this area that include the creation of new habitat in the medium term i.e. after 2030. Sufficient funding would need to be found to deliver either option.

#### Dawlish Warren (see also Exmouth)

**5. What will Dawlish Warren look like in the future if the Strategy's proposals are followed?**

We have produced some images to help visualise the possible future changes, which you can see at our drop-in sessions. The exhibition also includes some historic images that show what the Warren looked like in the past, for example in the late 1940s after storms flattened the far 'hook' end. These give us a good indication of what the Warren could look like again in the future if it is shaped by natural processes.

**6. When might Dawlish Warren spit be breached or flattened and how confident are you of this date?**

Our best estimate is that the main body of the spit will continue to carry out its wave sheltering function over the next 100 years. The far 'hook' end of the sand spit is likely to breach and flatten out between 2030 and 2060. The shape of the Warren has changed continuously in the past and we have a long historic record of this. For example the 'hook' end was flattened in the 1940s after significant storms. This means that we have a good degree of confidence in how the Warren will behave in future in response to natural processes.

**7. If your predictions show that Dawlish Warren will become less effective over time as a shelter for the inner estuary what additional flood defences will be needed elsewhere and when will these be built.**

The strategy recommends that the existing estuary defences are improved to offset the impact of reduced shelter from the Warren in the future. This would generally require raising existing defences, rather than building completely new ones. This work has been included in our longer term recommendations, for example at places such as Starcross and Lympstone. We do not expect improvements to be needed before 2030 but the situation will be kept under review.

**8. Previous studies have shown that it would cost three times as much to build new defences around the Estuary than to protect the existing defences to Dawlish Warren sand spit. What is the effect of a more natural Dawlish Warren sand spit on the rest of the estuary?**

The value of the Warren providing shelter to the rest of the estuary is recognised for the near future. However, this sheltering effect of the sand spit cannot be relied upon long term because of predicted sea level rise. Continuing to defend the Warren is not sustainable in the long term, because of the high costs and the detrimental impact the defences are having on the quality of the sand dune habitat there. The Strategy recognises that at some point in the future there will be a need to improve defences elsewhere around the Exe Estuary.

**9. What is the likely cost of the beach recharge?**

Both the Exe Estuary Strategy and Teignbridge District Council's technical studies have identified short term costs of between £6.3M (for assessment and regular recharge/recycling of beach material onto Dawlish Warren and Exmouth beaches) and £8.4M (for a one-off recharge with 5 yearly recycling). However, this does not include costs associated with groyne maintenance.

**10. Can we rely on dunes in the central section of Dawlish Warren sand spit if gabions are removed?**

The proposed first phase of gabion removal is located where the dunes and landward levels are slightly higher (above Mean High Water Spring levels) than elsewhere. This will support the dunes slackening and moving landwards, and will reduce the possibility of regular, large scale inundation of the inner sand spit. The central section of the sand spit also has older, now inactive, dunes located around the golf course. These are wide and high and can be relied upon to continue to offer a high standard of protection from tidal flooding. In addition, it is proposed a new embankment is built across the Warren to reduce the risk of flooding to the amenity attractions and Dawlish Warren village.

**11. How can you be sure that sand dredged from elsewhere and put on the beach at Dawlish Warren and Exmouth will stay there for any length of time?**

The strategy recommends that a beach recharge and recycling scheme is undertaken. As and when this recommendation is agreed, further detailed studies will be carried out with the specific aim of designing the scheme so that sediment remains where it needs to be. This could involve the use of groynes, for example, which can help to keep sand in place. (See also the section on Dredging and Exmouth).

## **Dredging**

### **12. Where will you dredge the sand from if the proposed beach recharge scheme goes ahead?**

This still needs to be considered and will only be allowed after detailed study and a licensing process. It's possible that the sand will come from Pole Sands as the sand here is part of the Exe Estuary system and so matches in terms of type and size. This option would also reduce travel costs. Our draft Options Assessment Report considers possible dredging of material for the beach recharge scheme a number of sites - from Pole Sands, Bull Hill banks or the channel entrance. At Pole Sands the report concludes that the process of dredging and beach recharge could be designed to effectively work with the ongoing sediment transfers. At Bull Hill banks the report states that the process of dredging and beach recharge would tend to redistribute material away from the inner estuary, back to the coastal system. (See also the sections on Dawlish Warren and Exmouth).

### **13. Are there any benefits if dredging is restarted in the estuary?**

Our technical work to date suggests that, if dredging is restarted in the estuary, depending on its scale, it could result in an increased loss of intertidal habitat. Under the Habitats Directive this would mean that additional sites would need to be identified around the Exe Estuary to create new habitat to compensate for that lost as a result.

## **Engaging with the Strategy**

### **14. How do I find out about what the Strategy means for me and my community?**

The draft strategy consultation document shows the main recommendations for every community around the Exe Estuary. The technical documents are also available online and these give more detailed information on how we have arrived at our recommendations and what has been considered.

Further information can be found on the Environment Agency Exe Estuary Strategy web pages at [www.environment-agency.gov.uk/exe/estuary](http://www.environment-agency.gov.uk/exe/estuary) .

If you represent an organisation or community group and would like someone to come and talk with you please contact the Living with a Changing Coast Project Officer, Jane Lavick, by email at [jane.lavick@environment-agency.gov.uk](mailto:jane.lavick@environment-agency.gov.uk) .

### **15. What impacts will the Strategy have on my business?**

The Strategy could have a number of impacts on local businesses operating around the Exe Estuary – some positive and some less so. The Strategy seeks to find solutions which will protect the maximum number of people and properties around the Estuary from tidal flooding into the future, at the best cost and with the fewest impacts on the environment. We are speaking face to face with local farmers and tourism businesses that may be affected, but if you are unsure or concerned about the potential impact on your business please get in touch with us.

### **16. I would like a face to face meeting– who do I need to speak to?**

We are holding three drop-in sessions at so you may like to come along to the most convenient session for you. These are open to everybody. You do not need to book and can come along at any time to view the exhibition or ask questions. Unfortunately we are not able to meet to discuss every individual concern but if you would like us to come and speak with your community, interest group or parish council please contact the Living with a Changing Coast Project Officer, Jane Lavick, by email at [jane.lavick@environment-agency.gov.uk](mailto:jane.lavick@environment-agency.gov.uk).

### **17. I would like to ask more detailed questions– how do I do this?**

You can put your questions in writing to Martin Davies at the address below and we will aim to answer these within 20 working days.

**18. How can I submit my comments, as I can't make it to any of the local meetings or drop in sessions?**

You can send us your comments in a number of different ways. We would encourage you to use our e-consultation option if possible, as that reduces the need for paper or travel. You can find this at [consult.environment-agency.gov.uk/portal/](https://consult.environment-agency.gov.uk/portal/)

Alternatively you can email your comments directly to [martin.davies1@environment-agency.gov.uk](mailto:martin.davies1@environment-agency.gov.uk)

Or you can post written comments to us at :-

Martin Davies - Exe Estuary Strategy  
Environment Agency,  
Manley House,  
Kestrel Way,  
EXETER,  
EX2 7LQ

**Exeter**

**19. How will the proposed Exe Estuary Strategy impact on the flood defence scheme for Exeter, including the use of Exminster Marshes as flood storage for the Alphington Brook?**

No impact is foreseen, as there is currently no need to realign tidal defences around Exminster/Powderham. This means that for the foreseeable future Exminster Marshes will continue to act as flood storage for Alphington Brook. The same consultants are working on both the proposed Exeter flood defences and the Exe Estuary Strategy so any impacts that do arise in future will be considered in a coordinated way.

**Exmouth**

**20. Why are you considering taking sand from Exmouth and putting it on Dawlish Warren beach?**

This is not what is planned. Teignbridge District Council are leading a technical study into the possibility of beach recharge. This means they are looking at whether beach material, such as sand can be brought onto beaches at Dawlish Warren and Exmouth to restore falling beach levels. Whilst this is not part of the Strategy it is a complementary piece of work as extra sand could make the beaches more attractive to users and it could also help to maintain the sheltering function of Dawlish Warren for longer into the future. (See also the sections on Dawlish Warren and Dredging.)

**21. So where will the sand come from if the beach recharge goes ahead and how can we be sure that it won't increase flood risk to Exmouth?**

A number of different options are being looked at currently. The best match in terms of sand is Pole Sands at the mouth of the estuary, as sand here now has come from Exmouth and Dawlish Warren beaches in the first place. Using a local source would also reduce the need to bring sand in from long distances. If Pole Sands is used it is estimated that less than 10% of the sand there would need to be removed for the beach recharge, so this is highly unlikely to increase flood risk for any coastal communities. Wherever the sand comes from its removal will be subject to a licensing agreement, which will consider likely impacts in more detail. See also the sections on Dawlish Warren and Dredging.

**22. A proposed developer at Exmouth is being asked to raise floor levels by 1m. Would it not be better to protect the whole area, including existing neighbouring properties?**

The option to provide new flood defences for this whole area has been identified and this would require local funding contributions.

## **Flood defence schemes**

### **23. I can't see any real details about proposed new flood defence schemes in the Strategy – where can I find this information?**

That's because the Strategy sets out the overall priorities for managing tidal flood risk into the future for the whole of the Exe Estuary and is only intended to give an overview. Whilst it highlights where improvements to flood defences may be needed it does not give details about exactly where walls will be built, how high or what materials will be used. All of these details will be considered at the next stage, when funding has been identified to build new local schemes. There will be opportunities for stakeholders and local communities to influence these details before building work starts, as has happened with other new flood defence schemes along the coast, such as at Shaldon and at Teignmouth.

## **Flood risk**

### **24. Does the Strategy take into account fluvial and tidal risks in combination because the risks due to tide-lock are worse than from the tide alone?**

The focus of the strategy is on tidal flooding but we recognise that many communities, such as Exton and Dawlish face a combined risk of flooding when surface water cannot drain freely into the Estuary because of high tides (tide-locking). The impact of tide-lock has been looked at but will need to be addressed in more detail for locations at risk at the next stage of the process, when the detailed design of potential flood defence schemes is considered.

### **25. What can be done to minimise local flooding caused by backing up of river water flows when there is a high tide and fresh water cannot drain into the estuary (tide-locking) ?**

The problem is recognised at a number of locations around the estuary. Following the strategy, further studies will be carried out as necessary, for example at Clyst St Mary, to recommend ways to reduce this risk. This may result in improvements to flood defences to protect communities.

### **26. Have you assessed the impacts that the Strategy could have on critical infrastructure, such as hospitals, schools, roads, electricity substations, water and sewage treatment works?**

The strategy has assessed the impacts on critical infrastructure, and has included the benefits within the assessment of options. Where possible, the benefits have been quantified. If this is not possible, the benefits have been described within the Strategic Environmental Assessment.

## **Funding**

### **27. I've heard that although something is highlighted in the Strategy this doesn't mean that funding will be found to deliver it. If funding is limited which parts of the Strategy are most likely to be funded?**

There is a need to look at this and the opportunities for co-ordinating funding between partner organisations. Communities with larger populations, where more people and more properties are at risk are more likely to receive national funding than elsewhere, as the cost to benefit ratio will be lower. It may become increasingly difficult to continue to provide flood defences for very small settlements, isolated properties and farmland. In addition to national funding money can come from through Local Authorities, the South West Flood and Coastal Committee's local levy [raised through County and Unitary Authorities] and from local contributions.

### **28. How will funding for the Strategy be co-ordinated, and how can everyone be made to pay?**

We will use the existing partnerships, led by the Environment Agency, to provide coordination of programmes across flood and coastal defence operating authorities.

**29. What is included in the cost-benefit analysis and how is this undertaken?**

The cost-benefit analysis follows government guidance for Flood and Coastal Risk Management. It takes account of household, environmental and other benefits including disruption to businesses, transport and other infrastructure. It is based on a calculation of damages that would occur with and without a coastal defence scheme, and the costs of providing the scheme.

**30. What are the options to generate additional finance which could be used to pay for new or improved flood defences locally?**

This is called partnership funding and may come from local authorities, developers and others who will benefit.

**31. How is funding secured to deliver the proposals identified in the Strategy?**

National funding is based on the level of benefits that proposals provide. Other contributions may be essential for the proposal to proceed if national funding is insufficient. The Environment Agency will work in partnership together with local authorities to identify funding for necessary schemes.

**32. Who decides on the priorities for spending on flood and coastal defences and which schemes go ahead first?**

Government sets the policies that determine how much national funding is available and how this will be allocated according to the outcomes (benefits) that schemes provide. The Environment Agency manages the allocation of national funding. Since funding will generally rely on both national and local partnership funding, both can affect priority.

**Habitats**

**33. Why do you need to create areas of new habitat around the estuary – it seems like birds are protected more than people?**

The natural environment helps to make the Exe Estuary special, so we need to protect both people and the habitat for wildlife. New habitat is needed because coastal defences can 'squeeze' existing intertidal habitat. The technical work behind the Strategy has estimated how much intertidal habitat (egg saltmarsh, mudflat, sand dune) will be lost in the future due to coastal squeeze i.e. the area that will be drowned out at high tide in the Exe Estuary as a result of the sea level rising against built flood defences. Because the habitats of the Exe Estuary are protected under UK and European law we have to ensure that the area of intertidal habitats is not reduced over time. This means that the Strategy has to identify sites where suitable new habitat could be created, before it is actually lost. This is a complex issue because the Exe is a relatively small estuary. We are speaking with landowners whose land may be suitable for new habitat to seek their agreement before progressing.

**Railway**

**34. The future of the mainline railway (Exeter – Penzance) is crucial to the rest of the South West. Is the commitment to the line still there from Network Rail?**

Network Rail are partners in the development of the Exe Estuary Strategy and have helped to develop the draft recommendations. They have said that they are committed to keeping this line open and are working with us to agree a programme of future flood defence improvements and necessary investment which will continue to protect the railway and communities behind it, such as Starcross.

**35. How can we find out where local culverts run under the railway line into the estuary and how these are maintained?**

Network Rail has this information and should be able to give it to any communities that need it. Following on from a stakeholder event Starcross Parish Council have already met with Network Rail officers on site to discuss maintenance of culverts underneath the track.

**36. As the mainline railway is a piece of strategic infrastructure how can we access financial contributions from further afield to ensure its longer term maintenance and upkeep?**

The strategy recognises that the mainline railway is a piece of strategic infrastructure, and has wider regional benefits. However, the economic case to maintain and improve the railway against flooding is strong enough based on local benefits.

**37. If sea level rise predictions are correct what improvements will be needed to the railway line to continue to protect properties behind it from high tides and storms, as at Starcross?**

The railway lines around the estuary currently have a high standard of protection against tidal flooding and damage from storms, with the exception being the coastal reach from Dawlish and westwards. It is not expected that improvements would be required until after 2030, dependent on sea level rise.

**Sailing**

**38. How will the Strategy affect sailing and navigation in the Exe Estuary?**

The coast will continue to evolve and adapt naturally as it always has done, with or without a strategy, and this can affect navigation as the position of channels and sandbanks changes in the estuary. The strategy will enable the continuation of the existing sailing and navigation in the Exe Estuary. After 2030, as and when the Dawlish Warren sand spit evolves, there may be changes at the estuary mouth. At this point navigation may need to be changed, but the impacts on sailing should be minimal. The exception to this would be during storm events, where the sand spit would offer less protection than now.

**Tourism**

**39. How have the impacts on tourism been considered in the cost benefit analysis performed as part of the Strategy?**

The impacts on tourism have been included qualitatively in the Strategic Environmental Assessment. The impacts have also been considered in the cost-benefit analysis, but are not used to support national funding of schemes.

**40. How will the beaches and tourist facilities at Dawlish Warren and Exmouth be affected by the proposals in the Strategy?**

The strategy recommendations for both Exmouth and Dawlish Warren will either maintain or improve the beaches and tourism facilities. At Exmouth, the recommendation is to recharge the beach to ensure it keeps pace with sea level rise and this will require local funding. At Dawlish Warren, the recommendation is also to recharge the beach to ensure it keeps pace with sea level rise. This will also involve the removal of the rock filled baskets (gabions) that are reducing the aesthetic value of the beach and the quality of the sand dunes. These actions should help improve the amenity value of the beach.

**What happens next and delivery**

**41. Who agrees the strategy and what happens next?**

After we have considered all comments from the public consultation, a final version of the Strategy will be submitted to the coastal operating authorities, and other partners including Natural England, for agreement. The agreed Strategy will then be submitted to the Environment Agency nationally for approval.

**42. When will we see real action or changes actually happening on the ground as a result of this Strategy?**

Delivery of coastal defence schemes that are within an agreed Strategy can be streamlined because they have been agreed by all partners involved in principle. Some potential improvement works are already being considered, so when the Strategy is agreed these can be progressed rapidly. However we will still need to undertake detailed design and they will still need to be agreed locally.

## Exe Estuary Flood and Coastal Erosion Risk Management Strategy Public Consultation Responses

The public consultation period for the above draft Strategy ran from 21 January to 04 March 2013. The following responses were received in connection with the public consultation. Some responses were received after the closing date, but have still been included here and have been considered by the Environment Agency. Responses were received as emails, letters, handwritten questionnaires/comments, a petition and via the Environment Agency's e-consult site.

A total of 154 responses were received, which comprised:

- 119 Emails and letters, some requesting information
- 16 Questionnaires / written comments provided at drop-in sessions
- 19 e-consult responses

A petition containing over 400 signatures was also submitted by Darts Farm.

Responses are reproduced in this report, as we received them. Where people agreed to have their personal details included these will be visible. In other cases personal information, including names, addresses and contact details have been removed, except where these relate to elected representatives who have responded in this capacity.

This report is not intended to provide any analysis of responses, nor does it detail what the Environment Agency and its partners propose to do as a result of the public consultation. Discussions with partner organisations are still ongoing to agree the way forward.

## Responses received in date order

**1**

Exmouth resident

“Concern about surface water/sewage flooding in Exmouth.”

**2**

Tim Sansom on behalf of Anne Marie-Morris MP

“Would like a copy of the Exe Estuary film”

**3**

Starcross resident

“I'd like to see the location and detail of the offshore barrier option assessment & sediment modelling including reasons for dismissal”

**4**

Clyst St George resident

“Want to see timescales for Exeter Flood Defence Scheme proposals.”

**5**

Topsham resident

“Please send map and details of legal obligations of habitat regulations”

**6**

Exmouth Residents & Traders Association

“Would like more copies of consultation brochure”

**7**

Trevor Cope, Exmouth Town Councillor

“Concerned about Bathing Water quality monitoring at Exmouth. Want to know who knows when South West Water pumping station overflow alarms get triggered to ensure monitoring doesn't occur afterward. Exmouth has 2 failures, next time black flag for 5 years? Dire consequences on tourism.

**8**

Lympstone resident

“Would like a colour A3 or A4 map of floodplain through Lympstone”

**9**

Exmouth Town Council

“Please send the link to Options assessment report”

**10**

Bishops Clyst resident

“What is the actual quantity of intertidal habitat lost in the Exe Estuary over the last (say) 10, 20, 30 years”.

**11**

Bishops Clyst resident

“How has development increased flows and how has climate change data been incorporated?”

**12**

Cockwood resident

“Concerns about funding”

13

Topsham resident  
'Birds before people'

14

Transition Exmouth

"Given the size of the problem the strategy adequately responds to the risks. Yes the Strategy considers all the important issues. I support the Strategy recommendations. It would very useful to have some idea how voluntary groups can best to contribute in supporting your work."

15



6 February 2013

Dear Mr Davies

**Exe Estuary Shoreline Management Draft Strategy**

I am writing to you after visiting the exhibition at Exmouth Pavilion today and talking with Environment Agency staff there. I am a resident of Lower Lypstone and [REDACTED]

The draft strategy is very welcome in providing a framework for action and in bringing well-informed analysis to support and shape this.

Importantly, I was concerned that the coverage in the strategy and in the presentation materials was weaker for Lypstone than for other estuary-side communities, notably Starcross. I have written to the Lypstone Parish Council urging them to make makes all necessary comments on the draft strategy before you closing date.

Points specific to Lypstone that I make in response to this consultation are as follows:

- The strategy doesn't adequately consider the effect on Lypstone of the combination of adverse conditions in the estuary (high spring tides, low atmospheric pressure, tidal surge etc) and simultaneously in the Wotton Brook (cloudburst, saturated ground, debris etc, all as seen in November 2012). We seem to have two separately adequate schemes, but no obvious integration of these, and a resulting vulnerability to a combination of circumstances. It was very fortunate in November that the very high though brief flows in the brook coincided with low tide.
- The progressive rise in sea level forecast will significantly worsen the effects of tidal lock (lengthening the period per tide) and have a large effect in combination with the severe weather events and intense rainfall which the EA envisage as happening much more frequently– all threatening the lower village with potential overtopping of the current river defences.
- The adequacy of the river defences along the brook needs review. The flood walls in places are no longer vertical and are not buttressed, the flood channel is now heavily silted and the area east of the car park owned by [REDACTED] has become overgrown and is unlikely to function as a tidal reservoir as well as originally designed. The large conifers around this area are potentially unstable; one fell in December and is it simply fortunate that it fell away from the flood wall.
- The draft strategy has no comment on the need to protect or re-align the waterside road at Sowden End. (A section of Sowden Lane further up the hill was realigned many years ago because of erosion; doing so for the section now vulnerable would need to take land from the village allotments.) This section of road is now part of the very popular Exe Estuary Trail and an important secondary route into the village. Judging from cliff falls nearby, action is needed here within 20 years.
- The draft strategy envisages a 'wall raising of up to 1.4m' at Lypstone within a century, with very significant implications for the character of the lower village. These need to be considered by the community at an early stage; it would be better to consider the longer term possibilities rather than adding a few layers of bricks or stones every few years. On the face of it a raising of defences by 1.4m would be incompatible with preserving the multiple 'drangways' giving access to the foreshore, but I recall strong local opposition to

## Exe Estuary Strategy Consultation Report

a single wall in front of the waterside properties when the 2009 defences were being considered. A rise of 1.4m would remove water views from downstairs rooms of waterfront properties (mine is not one of these). It seems to me that the especial circumstances that exist at Lympstone have not been fully nor adequately addressed in the draft strategy, and I would ask that this be addressed in this final stage of strategy production.

Yours sincerely

[REDACTED]

16

[REDACTED]

[REDACTED]

Firstly, the Dawlish Warren beach regeneration scheme will substantially protect us in Topsham in that I know that we had far more flooding on the Strand here during the 1950s when, as you appreciate the distal end of the Warren was so much less; the changes there over only a decade now are so amazing.

Whatever the reasoning behind the planned changes on the Warren I do not fully understand but the decision to recharge from Pole Sands is oh so sensible as the original thought to import sand from off the Isle of Wight could have been bad news for the navigation channel.

Having said that, we can't forget that as [REDACTED] has always said, the system has lost a massive sand volume into the fluvial delta at the end of the navigation channel; is this not the place too take the sand from?

Secondly, the news that the estuary canal bank should be raised by 300mm is so good for the wellbeing of the canal, as this bank is very erodable and substandard compared with the rest of the canal, primarily because it is so inaccessible. In the meantime I will be putting up my own 300mm storm boards at home here and thus sleep peacefully!

[REDACTED]

[REDACTED]

[REDACTED]

17

20 February 2013

Dear Martin

### **Managing flood & coastal erosion risk for the Exe Estuary**

Well done, that was a very clear presentation you gave us in the Matthews Hall the other night, thank you. We now fully understand what is meant by 'Coastal Squeeze' on the Exe, because of the rail lines/sea walls! Although we feel now that the causes of sea level rise also needs to be acknowledged as the likely causes of changes to bird flock sizes and habits in these volatile climatic changing times, as well as the perceived threat of more housing/human disturbance. The Exe Estuary is protected along most of its shores from human disturbance by railways and therefore the lack of access. That is a huge controlling feature unique to the Exe.

Our other concerns relate to the Clyst inter-tidal proposals. Has enough science been done to ensure the proposed changes do what they say they will, without loss and damage to other activity there? A Valley currently a natural habitat to many country, farm, garden birds and other species as well as valuable farm land. The consequences of getting this wrong can not be reversed easily. Once the tide has encroached, the land is damaged for decades whilst the salt is leached out, never mind the cost. The land will be lost to farming just when we are being told we will need greater amounts of farm land to feed the increased population we are trying to house. Next we will be told protection and new habitat is needed to conserve our country, farm and garden birds. The balance needs to be examined and the science checked again.

## Exe Estuary Strategy Consultation Report

Glad to hear there will be monitoring before, during and after changes of the Clyst banks around the Bridge Inn, Fishers Mill and the bridge. Vital we suggest!

A bit nervous about the long term proposals for Dawlish Warren! Interesting .....

Yours sincerely

[REDACTED]

[REDACTED]

### 18

Letter received MD

'With Exeter being granted monies for their flood defence management- this will surely have an impact on the River Exe & canal & Topsham. Further down could it have a counter effect on tidal erosion?'

### 19

Hi Martin and Graeme,

Thanks for coming this morning.

Brilliant presentation! Just what we needed after all these years.

I tried to get as many folk as I could to attend and didn't recognise a good number!

Unknown to me at the time there were 5 representatives from the Golf Club present as well.

In addition the Lady Mayor (Pauline Broomfield) was also with us in addition to DTC, TDC and DCC Councillors so your time was very well spent here.

Martin, Graeme mentioned the 4 pictorials specific to our project that you may be able to let us have so that those who could not make the various presentations can see what you envisage – is it possible? I can then email them out with a request for comment to respond to the consultation. Also mentioned was Appendix H – can you give me a link to this document so I can see it please?

For your interest, at our meeting afterwards everyone at the table bar 1 abstention was in favour of what you had presented (which included the 1 (remaining) of the 5 Golf Club reps). So that is great news from where I am sat.

Thanks again.

Kind regards

[REDACTED]

Secretary - Dawlish Warren Tourism

### 20

Dear Martin

Thank you for the prompt response to my letter of 7 February and for forwarding material on to relevant people for consideration.

I am sending you by post two items to take our exchange about Wotton Brook further:

- A report with a set of photos of the current state of the Wotton Brook flood walls in the village plus two historic photos. These address what appear from a visual inspection to be significant signs of structural deterioration.
- a short video of the flooding in the Brook last November (a late evening flood, so dark in parts). This shows, amongst other views, the intensity of flow of the Brook (which I estimated as water travelling at c 15mph) and the flooding of the car park and Underhill from water coming out of drains and the underground tanks.

Turning to coastal erosion, Lympstone Parish Council has regularly covered at its meetings the threat to 'The Rag' (a small parcel of amenity land on the low cliffs north of Sowden End. This is suffering continued

## Exe Estuary Strategy Consultation Report

erosion and there has been discussion about needing to close itN/A to the public. There has also been discussion at meetings since December of the loss of stones from the retaining wall below the seats at Sowden End and damage to part of the slipway there. This road is as you say 'a secondary route', but is also a key link in the Exe Estuary Trail, used by around 200,000 cyclists and walkers each year. I had assumed that the strategy would seek to avoid the loss of any through roads along the estuary.

Here is a photo of the significant works undertaken c 40 years ago to move the section of the same road 100-200m north of Sowden End back from the crumbling cliff edge (looking south), so I am surprised that 'The strategy team were not informed of, or found any documentation of active erosion issues at this location'

[photographs not included here]

21

[REDACTED]

Date: February 22<sup>nd</sup> 2013

Dear Mr Davies & Ms Lavick

Re: Licco project Topsham

I am writing on behalf of the Topsham Small Craft Club, we are a small club who lease an open piece of the recreation ground from Exeter City Council to store 70 small rowing tenders for 9 mths of the year during the boating season which is prone to flooding on spring tides now.

I understand from my discussion with Mr Davies at the Topsham drop in session that you are considering the possibility of raising an embankment alongside the Ferry Road Recreation Ground to protect properties. I have some points to raise that need to be considered and clarified when making your decision.

- 1 Is it your intention to let the childrens play area flood as well as the dog walking area? If so the play area could become very muddy and unusable. The Dorothy Holman Community Centre needs some serious thought as does the SWW pumping station beside it and the Scout hut behind.
- 2 Raising an embankment would need a very gradual slope for access and could make it awkward and possibly dangerous for young mums, there pushchairs and kids with there scooters, skate boards and bikes when leaving the Recreation Ground and coming out onto a road, also disabled people and there electric mobility vehicles who use this a lot.
- 3 Vehicle access for grass cutting would need to be taken into account as would vehicle access at the north end of the park for the dinghy park maintenance.
- 4 There would need to be a lockable vehicle access gate for security reasons as there is at present also at the north end of the park.
- 5 I understand your reasoning for a flood relief catchment area but flooding a public park! is not the answer and this is surely not a big enough area to be of any sizeable use. I also understand about the build up of surface water and water rising up through the ground but it seems to me raising the embankment alongside the river would be the better option with maybe culverts in the bank.

I look forward to your reply.

Yours Sincerely

[REDACTED]

22

Dear Mr Davies & Ms Lavick

February 22<sup>nd</sup> 2013

Re: Licco Project Topsham

I understand that the concern for The Strand Topsham is not so urgent as Ferry Road / Recreation Ground but I consider some parts of The Strand are, namely Oak Slip and Hannafords Quay.

[REDACTED]

## Exe Estuary Strategy Consultation Report

The house is situated alongside Oak Slip/Jetty, this jetty is lower than the road by approx 300mm and I am a little concerned to say the least, she has right of way over the slip to gain access to the rear of the property. Last November in the bad storms and high tides the water was lapping at the back door on the slip and I feel this needs some attention, the water was also lapping over Hannafords Quay wall where properties opposite needed sand bags.

I feel both these points need some consideration and attention.

I await your reply

Yours sincerely

[REDACTED]

### 23

[REDACTED]

"I'm trying to get hold of the 'habitat creation report' (AHA 2012), referred to in Para. 5.1.6 of the SEA Environment Report." Devon Wildlife Trust

### 24

"I would like further copies of the consultation brochure for distribution" [REDACTED]

### 25

Sirs

I am writing to support the Clyst landowners and the Bridge Inn's objections to the lower Clyst project. Having carefully read the draft strategy consultation project, it would become obvious to anyone that the project cannot go ahead, at least in its present condition – namely, half thought about. The consultation document is so vague and full of self-doubt and the potential consequences large, expensive and irreversible that it would seem madness to proceed. "Could be" and "may need" are not phrases that belong in such a project.

Meanwhile, the Clyst landowners and Bridge Inn have raised several detailed questions and concerns, which have yet to be addressed in any detail. I hope to be able to read your thorough responses in the near future. Please, respect these people, and their opinions.

[REDACTED]

### 26

Dear Sir,

I may be taking a simplistic view but you say this will not be done if the Land owners don't want it and 20 out of 20 say they don't (Which incidentally I agree with) then surely it is time to end this Madness ?

As Regards your claim that the road across Topsham Flats would be safeguarded, this would involve an elevated section of considerable length costing an enormous amount, more absolute madness in our economic climate when a perfectly serviceable link exists (if your project does not proceed !)

[REDACTED]

### 27

Dear Mr. Davies,

I live in Elm Grove Road, Topsham and have been interested in all the recent discussions about the future of the Clyst Valley.

I feel that the Clyst Valley landowners, along with [REDACTED] [REDACTED] are right to oppose the Lower Clyst Project, under which I believe it is planned to allow tidal waters to flood the fields in the future.

I object to the scheme and I look forward to seeing your responses to their detailed criticism and questions.

Yours sincerely,

[REDACTED]

[REDACTED] 28

## Exe Estuary Strategy Consultation Report

Dear Martin Davies,

Can i lodge my opposition deliberate effort to flood the Clyst Valley East of the Bridge pub.

I feel that the are is currently of outstanding beauty and the case for changing it to salt marshland has not as yet been made convincingly to residents or landowners who will be directly affected by this.

I know you have made a number of assurances that nothing will change until the busy Topsham to Exmouth road is protected, but without and plans for how this is to be done and where the funding is coming from it seems a little premature to talk about offsetting lost saltwater marshes that may be caused by water level rises in 25 years time.

I live down close to the Clyst river and find the current wildlife that we enjoy is truly outstanding we have seen Barn Owls, otters in addition to the huge number of migrating birds at Darts sanctuary where scrapping out of wetland ponds has substantially increased the bird populations.

In summary i feel that the case has not been made for changing a valley that we the residents truly love as it is, in an experiment in biodiversity that is as yet unconvincing.

Many thanks

I would appreciate been kept informed of any decisions via this email address if possible.

**29**

Dear Mr Davies,

Having had the Lower Clyst Project brought to my attention, I am surprised that the wider community in Topsham and Exeter have not had more consultation in this matter.

It seems to me that the decision to go ahead with this project should be decided by those whom it effects, namely the people of Topsham and Exeter but more importantly, whose who live in the immediate area.

Whilst the notion of the intended project seems honest, I find it peculiar that a habitat creation project which would have such significant impact on a community which clearly relies on the routes currently under threat from the proposal, is not more sympathetic to those who would be effected, especially those who own land in the region.

Kind regards,

**30**

Dear Mr Davies

I am in agreement with the Clyst landowners and Bridge Inn objection to the Lower Clyst Project. I look forward to seeing your responses to their objections.

Regards

**31**

Dear Mr Davies

I am writing to object to the flooding proposal and, in particular, the possible loss of the road across Topsham flats which is our main route into Topsham and Exeter.

The additional mileage for us to get to Topsham (at least a daily journey to post business items at Topsham Post Office) would be expensive in fuel and harmful to the environment.

I agree with the Clyst landowners and Bridge Inn objections to the Lower Clyst Project, and look forward to seeing your responses to their detailed criticisms and questions.

**32**

Dear Martin Davies

I understand you are the person to receive this objection to the planned flooding proposal in the Clyst area. Please include my objections which are attached.

Many thanks

[REDACTED]

[REDACTED]

26<sup>th</sup> February 2013

Dear Consultation Committee

I am writing as a matter of urgency to ask that you uphold the concerns of the landowners of the Clyst in the Topsham area and that of The Bridge Inn. Their objections are of the upmost importance to the community of Topsham and we are very concerned that the Environment Agency seems not to be able to answer these concerns.

You state that you are willing to listen to our worries but do not appear to be able to give clear answers to our questions. It seems that the RSPB and Environment Agency see the impact on the "natural habitat" only to affect the bird and wildlife on this area and not the humans who live, trade and drive through this extensively used transport link.

I find it incomprehensible that especially after the last few years of extreme droughts of rain that caused such local strains on our rivers including the Clyst, that anyone would think that floodwaters fighting with the tidal water upstream could be of benefit to anyone. A huge amount is spoken about Dawlish Warren and the environment there but our problem is one of human habitat being threatened.

I am in total agreement with that of the landowners and Bridge Inn so would therefore like to formally register my objections to your flooding plans and I shall await a detailed response to the concerns they have raised as soon as possible.

Yours

[REDACTED]

[REDACTED]

[REDACTED]

**33**

I wish to register my agreement with the Clyst landowners and Bridge Inn objection to the Lower Clyst Project.

We are amazed you could even consider a plan that places homes and businesses at risk of flooding. The impact of the road to Topsham from East Devon being closed on a regular basis will surely cause people to use the other route to Exeter and seriously damage local businesses.

I look forward to seeing your responses to their questions.

[REDACTED]

## Exe Estuary Strategy Consultation Report

### 34

Dear Sirs

I live in Woodbury and work in Topsham, finding the recent floods extremely time consuming and challenging to get to and from work. I agree with the Clyst landowners and Bridge Inn objection to the Lower Clyst Project, and look forward to seeing your responses to their detailed criticisms and questions. I object to your project.

Yours faithfully

[REDACTED]

### 35

Request from BBC Radio Devon to appear on Good Morning Devon programme

### 36

Martin

I attach further information about coastal cliff erosion at Sowden End complete with photos taken today – I know it's minor stuff compared with eg Sidmouth, but I do feel that some modest spend here soon could prevent the need for a larger scheme at a later date.

Please accept this as part of my submission to the public consultation on Exe Estuary erosion management. I have copied it to the chair of our parish council.

Kind regards

[REDACTED]

Coastal Erosion at Sowden End Lympstone

The low sandstone cliffs at Lympstone are eroding slowly. Erosion rates seem to be about 1-4m a century. Erosion is caused by three factors:

- Erosion from seawater – through direct action at high tide & storm conditions. The lower parts of the cliffs (up to c 3m above the beach) are very well water worn.
- Erosion from the top through minor falls of unsupported loose earth and rock. This is a continuous process, especially in wet weather
- Erosion when a tree or smaller vegetation is undercut and the whole root ball falls and takes a slice of the cliff with it. This is infrequent, but in places north of Lympstone's harbour it's possible to see on the beach decaying roots of large trees where they fell.

The rate of erosion is important in considering the need for future action.

Here is a postcard view (c 1910) of Sowden End, together with a current view:

[photographs not included here]

### 37

Dear Mr. Davies

I am writing to object to the flooding proposal, and the possible loss of the road across Topsham flats which is our main route from Topsham to Exmouth.

As a Topsham business man I can see that it would stop the through traffic causing a further loss of customers to an already shrinking market with the recent rise in car parking charges

I agree with Objections already expressed in print and look forward to seeing your response to their criticisms and questions

[REDACTED]

[REDACTED]

**38**

Dear Martin

I have visited your consultation exhibition and listened to various reports from people about the proposed project on the Lower Clyst

Speaking from a Topsham Traders point of view I am very concerned if this goes ahead and how the road being flooded /closed between the Bridge Inn and Darts Farm affects businesses and Trade in Topsham. I hate to be negative when you are trying to be active and promote extra bird habitat but we have already seen road closure a couple of times recently and trade was badly affected in Topsham.

We need to enhance business activity and not be adding another challenge to trading as many businesses can not absorb this kind of knock on effect of the lower clyst flooding and subsequent closing of road.

I really ask that you take into consideration these points for Topsham: Less Trade from periodic flooding, Less income into the local community, Less to the public purse, less hours of employment etc etc. These are all the things that during a recession we are trying to grow – please do not add another barrier! I know this is all really basic stuff but it will have quite an impact on things if it goes ahead.

Regards

█

█

**39**

Dear Sir

Please find attached BASC response to the

“Draft strategy and recommendations for the management of flood and coastal erosion risk for the whole of the Exe Estuary in Devon” consultation.

Please could you acknowledge receipt?

Yours faithfully,

█

Rural Land Development Manager for and on behalf of BASC

Date: 27<sup>th</sup> February 2013

Dear Sir,

**BASC response to Environment Agency Exe Estuary Flood and Coastal Erosion Risk Management Strategy consultation**

**The British Association for Shooting and Conservation (BASC) and BASC affiliated wildfowling clubs, who manage areas of land on the Exe Estuary, looks forward to working with the Environment Agency with conservation and managed realignment projects detailed within the Exe Estuary Flood and Coastal Erosion Risk Management Strategy consultation.**

BASC was founded in 1908 as the Wildfowling Association of Great Britain and Ireland and is the UK's largest shooting association. BASC is constituted as an Industrial and Provident Society and has a membership in excess of 130,000. BASC is the representative body for sporting shooting in the UK and the largest fieldsports organisation. It aims to promote and protect sporting shooting and the well being of the countryside throughout the UK and overseas. It actively promotes good firearms licensing practice, training, education, scientific research and practical habitat conservation. BASC believes that all who shoot should conduct themselves according to the highest standards of safety, sportsmanship and courtesy, with full respect for their quarry and a practical interest in wildlife conservation.

BASC's expertise in shooting matters is widely recognised and it is routinely consulted by a variety of government departments and agencies (including the Home Office, Defra, LANTRA & The Health and Safety Commission) and other statutory and non-statutory bodies.

BASC represents approximately 165 affiliated wildfowling clubs in the UK with a total membership of around 15,000 individuals. Wildfowling clubs manage more than a quarter of a million acres of land (104,000 hectares) in the UK, 90% of which is designated as sites of special scientific interest (SSSI). In England, Wales and Northern Ireland BASC affiliated wildfowling clubs lease some 700km of foreshore from the Crown Estate. Increasingly, wildfowling clubs are buying farmland that had previously been drained to allow

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farming. These areas are now being returned to wetland for the benefit of wildlife and quarry species. This complements Environment Agency managed realignment schemes and flood risk management.

Wildfowling is the pursuit of quarry species of ducks, geese and waders with a smoothbore gun, principally on estuaries and coastal marshes but also on large wetlands further inland. Wildfowling is usually a solitary activity and in England and Wales takes place from 1st September to 20th February on the foreshore and ending 31st January inland. Wildfowling is a recreational benefit for local communities and wildfowling clubs provide a focus for wardening of land, monitoring of wildfowl and habitat protection and improvement. The Birds Directive (1979) fully recognises the legitimacy of hunting of wild birds as a form of sustainable use. Wildfowling is an activity that provides significant social, cultural, economic and environmental benefits in the UK.

Management of the wildfowl resource by local communities is integral to the management of wildlife on our coasts and an important aspect of our coastal heritage. Land managed for wildfowling often plays an important role in local flood management risk strategies and wildfowling clubs are well placed to deliver continued benefits to such strategies, especially in the management of land involved in managed realignment projects. Wildfowling clubs manage land involved in Environmental Stewardship and Higher Level Stewardship schemes. BASC encourages more clubs and members to participate in such projects. We recommend greater empowerment of local communities in the management of land as a long-term strategic benefit to flood risk management.

As stated, many clubs undertake conservation work on the land on which they shoot, actively participating in Environmental Stewardship schemes for example, and undertake regular litter removal and clean-up work on the coast. Natural England (NE), which is the statutory conservation agency for England, recognises the value of shooting to conservation.

BASC recognises the importance of the coastal environment and the need to balance different user needs. The Managing flood risk on the Exe Estuary consultation should recognise the long standing and culturally important activity of wildfowling and the sensitive nature of the habitats over which wildfowlers shoot.

In 2004, an estimated 2.6 million work days were undertaken on habitat and wildlife management as a result of sporting shooting in the UK. This is the equivalent of 12,000 Full Time Equivalent jobs.

As a result of sporting shooting, £250 million was spent on conservation activities and that shooters themselves contributed 2.7 million work days, the equivalent of 12,000 full time jobs. £8 million alone was spent on tree planting. The total value of sporting shooting to the UK economy in the same year was £1.6 billion. (Source 2006. PACEC. Economic and Environmental Impact of Sporting Shooting in the UK. Available online at [www.shootingfacts.co.uk](http://www.shootingfacts.co.uk) ) Given this level of involvement, we hope that developing policy will recognise the important contribution shooting makes to the environment, and that the activities of those involved will not be inadvertently restricted.

BASC acknowledges the visions outlined in the consultation document for the Exe Estuary Flood and Coastal Erosion Risk Management Strategy. BASC believes this process complements existing government coastal initiatives which BASC and its members are actively involved in at national and local levels eg Shoreline Management Plans, Marine and Coastal Access Act, Coastal Change Policy, NE and Environment Agency programmes.

**BASC and BASC affiliated wildfowling clubs, who manage areas of land on the Exe Estuary, looks forward to working with the Environment Agency with conservation and managed realignment projects detailed within the Exe Estuary Flood and Coastal Erosion Risk Management Strategy consultation.**

Yours faithfully

  
Rural Land Development Manager  
For and on behalf of BASC

**40**

Dear Jane & Martin Davies

Thank you for your reply just two more points to raise.

Our Topsham Small Craft Club held there AGM Monday 25th February and the Licco project was discussed as this would affect our dinghy park and one of the points raised which i hadn't considered was from a health point of view, if the dog walking area is allowed to flood and flow over into the childrens play area there was concern about dog feeces that could be transfered from one area to the next, i know the marjority of dog owners pick up and it can also be seen that some don't especially when there so far away from the dog and when they eventually get to where they think the dog was they can't find it. When walking around the park you can see it but of coarse they think that's not my dogs so leave it .

The other point is under the terms of our lease we are responsible for the maintainence of the dinghy park and it is need of some major works now but we are reluctant to proceed untill this matter of flooding is decided on so a quick decission would be appreciated.

Thank you

Kind regards  
[REDACTED]

**41**

Dear Mr Davies

Please ensure that you register my complete opposition to the Lower Valley River Clyst Projects. I support the position held by the Clyst land owners and those at The Bridge Inn, Topsham.

Yours sincerely

[REDACTED]

**42**

Dear Mr Davies,

We are writing to you as longstanding residents of Topsham as we are very concerned about the threat of continued flooding of the Clyst River, and particularly the considerable disruption caused when the road between Topsham and Clyst St George is cut off due to flooding, as has happened twice this past year. Our understanding is that the proposed Lower Clyst Project will only exacerbate the problem further. We agree with the Clyst landowners and the Bridge Inn objections to the Lower Clyst Project and look forward to reading your responses to their detailed concerns, criticisms, questions and objections.

Yours sincerely,

[REDACTED]

**43**

Dear Mr Davies

I am writing to object to the flooding proposal and, in particular, the possible loss of the road across Topsham flats which is our main route to Exton and Exmouth where we have elderly family members whom we visit on a very regular basis.

I feel that the additional mileage would be both expensive in fuel and harmful to the environment.

I agree with the Clyst landowners and Bridge Inn objections to the Lower Clyst Project, and look forward to seeing your responses to their detailed criticisms and questions.

[REDACTED]

44

Martin

Everyone I speak to is up in arms with this project. I can find no townfolk that think it is good, sensible and a progressive move. The project is now over six years old and still being thrown around like an unwanted pair of shoes, ill-fitting, uncomfortable but fashionable. There has been investment in the new cycle ways and the new bridge; There is to be further investment in the cycle route by the railway across the mouth of the Clyst. And now you propose to threaten the lively hoods of the valley residents, users and access ways by flooding the lands at high tide; threatening the only through road to the town and the main bus route. What are you thinking of? You clearly have not studied the infrastructure of the town; you have no regard for our quality of life or the needs of the businesses that keep the town alive. I must say HANDS OFF TOPSHAM and the LOWER CLYST VALLEY. Leave it to the locals to manage the project in harmony with their surroundings.

Topsham effectively became an island this winter with three successive days of flooding in the Clyst Valley; with no effective bus service into Exeter, the commuters having to rely on the train, and some having to walk or revert to their cars. You talk of an environmentally friendly project - how can it be? Are you holding the people of Topsham to ransom? Lets put a sign up saying tidal road in winter and kill the essence of the town. There are not many city residents that can walk into a river valley and enjoy the countryside, farming and the wildlife all within a short distance of their front door. You would endanger their access to this along with the prosperity of the town all for a whim of complying with an EU directive? NEVER - live here and understand the area and you might then appreciate what an amenity you are trying to destroy. We have Bowling Marsh Green we do not need more.



45

Dear Mr Davies,

Thank you for your reply to my comments about the Clyst Valley flood scheme that has been proposed by your agency.

As I tried to indicate in my letter we are worried about anything that will have an effect on the beautiful valley in which we live.

I feel it is reassuring as you state that any changes that happen will have to meet with approval from planning which will lead to possible extra protection for the road.

However, as a concerned resident I do feel, I am still lacking in detail of what is actually being proposed. I must apologise if you have been through this a number of times but I still feel the lack of detail of exactly what is proposed is driving our concerns.

What exactly would the protection for the road and bridge involve, building a dyke what sort of size or raising the road would there be screening?

Further the creation of 38 hectares of habitat to the East bank just up from the bridge, does this mean there is no longer a proposal to change the West Bank.

Can I ask how exactly will the new habitat be created, will it mean punching holes on existing banks or removing certain banks completely.

Will this have the effect of allowing water to flood the fields on the east bank twice a day, or just on spring tides. How far up will the flood water come? Is it possible to take a picture of the current situation and the proposed view of what you expect to happen. Also, what effect would you expect this to have on the vegetation, would the bullocks still be able to graze? Again a superimposed picture would be very helpful.

I am aware you may have done this before but I am not aware of seeing it and without such detail it is difficult to comment as residents who look out on this diverse valley everyday without a clear picture of what you are proposing to do.

Further, as I am sure you would expect we would be strongly opposed to destroying our valley for the sake of some tick box exercise that says we need a certain level of offset salt marsh within the whole Exe estuary project because some EU directive recommends it.

I hope these comments are helpful and would invite you to take pictures from our balcony looking over to Darts bird sanctuary if you would find this useful.

With Kind regards



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**46**

Dear Sir,

I am writing to you to strongly object to the proposals of the Lower Clyst Project.

Being a local 'lass' I would be mortified to lose the wonderful lush green meadows surrounding the Clyst River with the cattle and sheep grazing. I have enjoyed my childhood and my children also in this beautiful estuary town, we have been very lucky. Mud flats I fear do not have the same appeal.

My second reason for being concerned about the tidal flooding of the Topsham Flats is perhaps a more practical one. I am also very lucky to now own and run a thriving business in Topsham. Recently when we experienced our wettest winter months for years the road between Darts Farm and The Bridge was closed due to flooding. This had a major affect on my business. The normal bustling Town was deserted. We had actually become a cul-de-sac with access only from the Exeter direction. How long do you think traders could support such lack of trade. In this economic climate we traders need every trading day possible. With Bank Holidays, Sundays and now High Tide Days the weeks are getting shorter !!.

I think if you looked at this matter seriously from your heart you will agree that we have enough land for birds who live and thrive on mud, we are surrounded by it. Do they really need our fields as well, can't you just leave it all as it is, a lovely balance of nature for all species.

Please, please do not change what we have. We want to keep it as it is.

Yours sincerely

[REDACTED]

**47**

Hi Martin

What a good idea, more places for birds to rest & feed.

The R.S.P.B. are spending my money on a reserve for wildlife, wildlife has no voice so we have to think of their future.

I thank you

[REDACTED]

**48**

*Extracts from completed questionnaire*

'Particularly the plan to raise the road on Topsham flats and flood additional farm land etc in that area for birds - an utter waste of money and resource, money spent better elsewhere. Leave as they are in this area.'

**49**

Please rethink - we keep hearing that the world will struggle to feed its population in generations to come, Britain will need all the land it has to feed its people.

We do provide for birds already in Devon.

Do not be judged by future generations as making a serious error.

Yours sincerely

[REDACTED]

**50**

Sir

I am writing to object to the proposal to alter the River Clyst flood plain by creating a bird habitat. In my opinion the spend is a waste of money and will have negligible benefit to birds.

[REDACTED]

51

Dear Mr Davies,

I am writing to lodge my very strong objection to the flooding proposal, especially the potential loss of the road which is our main route into Topsham and Exeter avoiding the horrible M5 junction. I use the route daily to Topsham to carry parcels (therefore no good for bus or train) and an alternative route would mean a considerable additional mileage which has cost and environmental implications. What of the new cycleway that has had millions spent on it? is that to be lost? we love the drive past Darts Farm and the Grandchildren love to see the animals, the Red Ruby cattle and birds that flock to the flats & also the river crossing – proposed to be replaced by a trip via dual carriageway & motorway if the road gets flooded! I agree with the Clyst landowners and Bridge Inn objections to the Lower Clyst Project, and hope your responses are considerate of all our concerns.

Regards



52

Dear Mike and Martin

We have spoken many times regarding my concerns over the proposed changes to the Lower Clyst ,I now put some of them in writing.

I am anxious that the proposed scheme will have a detrimental effect to us due to the increased volume of water causing scouring and erosion to the river bank beneath us and effect this ancient building, which has been my family home for the last 116 years.

I am anxious that the increased volume of water will also have an impact on the 18th century road bridge .

In my childhood the 'flats' were marked by white flood-posts , but since the 1960's the road has hardly flooded, the river, the banks , the ditches have been cared for and however this was done has worked!

The recent flooding caused chaos and Topsham suffered with loss of trade. Topsham is a town of many independent traders, who need support ,this road is vital to all of us, as well as the emergency services. We do not want to return to the road being flooded more often.

Our 'Green valley' is also truly special to us, to the farmers who have farmed this land for generations and want to continue to farm their land, would it not be better to help them maintain their river banks, drain their land, in my grandchildren or their children's lifetime we shall need this land , food production is changing, there won't be the energy to transport food around the world, We grow 'good beef' on our green fields and we know where it comes from!

My fear is for the unknown,should any part of this scheme go ahead I would wish to have written assurance that there will be no detrimental effect to us and that we will be protected.

I leave you with a quote from, The Devon Landscape by Thompson and Clarke 'A word or two must be said of the river Clyst. This wanton little river meanders through a low-lying valley to the east of Exeter, often submerged by floods, and joins the Exe at Topsham. After much rain the swollen waters sometimes render it impossible to pass by the main road from Topsham to Exmouth'... 1934.

let us not return to the 'good old days'.

sincerely



, the Bridge Inn , Topsham.

53

*Extracts from completed questionnaire*

'(2)When considering the 'East Bank of the River Clyst' the only issue you seem to be addressing is the welfare of the birds. You argue that you are conserving the wildlife of birds, however this frustrates me as your proposal supported by the government, seems to have absolutely no interest in preserving our local farming community who have been working the land for generations. If the recent, meat scandal first reported in January has shown us anything it is that farming within the UK needs to be sustained and nurtured to ensure more of these lapses do not occur. What upsets me the most is the notion that it is endorsed by the government, I deeply hope that the party this nations tax payers elected are not choosing to put the habitat of birds over the livelihood of the tax payer. I am mortified at the idea that our local community could be threatened so much for the sake of birds. I am paying taxes, not the birds. Surely there is a less severe option of relocating them than eradicating a road that is used more than 8,000 times a day and is vital for access to Topsham. Additionally, if your facts are correct and we will continue to see these dramatic changes in climate for the next 100 years, would we not be better to allow the birds to begin adapting to the new environment now, as it is not a passing phase, and the local government cannot sustain their exact

## Exe Estuary Strategy Consultation Report

habitat at tax payers costs and local people's convenience forever. May I point out that this is not the first time that our climate has changed drastically, environments have been naturally altering in cycles with or without human activity since the dawn of time and at no point have any other species interfered.'

(3)Funding is another issue. Again in the case of the East Bank of the River Clyst the only concern for the Environmental Agency seems to be the birds as although central government funding is suggested to create their new inter-tidal habitat. The necessary improved protection to the road will require local partnership funding, despite the fact that it major road linking Topsham, which is used over 8,000 times a day.

(4)No, for the reasons already explained above. I would also like to point out that the RSPB already acknowledged in 2002 that flooding areas to artificially replace intertidal habitats will result in unreasonable cost. The proposal seems very impractical.

(5)Furthermore, having taken an interest in the Environmental Agency's proposal and followed the issue for sometime I can safely say that there are many people just as concerned as I. Local people who do not understand why the welfare of birds is being put before the livelihood of local people.'

(6)It was well explained and well presented. However, the ideas propose for the East Bank of the River Clyst were are impractical and economically disagreeable.'

  
**54**

TOLLGATE FARMING LTD

Dear Mr Davies,

Re: Flooding Lower Clyst, Old Winslade Farm.

You will probably have received plenty of flak regarding the above issue, we are keeping an open mind on the EA/RSPB proposals and opposition to "same".

We have some observations and questions which the "Save our Clyst" protagonists seem to have overlooked, subject as follows:-

1. The principal cause of flooding at Old Winslade Farm is the failure of the main sluice gate and absence of repair/maintenance. As we understand it, the EA is the owner/ delegate responsible for the maintenance of the river bed to high water level, including sluice gates, so have failed in their duty of care to provide adequate service.
2. Approximately 12 hectares of land at Old Winslade have been inundated to date since July 2012. Is there any provision of recompense for the loss of revenue incurred due to negligence by the EA?
3. Are the EA claiming that it is a riparian duty of the land owner to maintain sluice gates, banks etc? If yes, are we entitled to proceed with repair/maintenance we consider necessary to preserve the integrity of the adjoining land?
4. If the EA/RSPB proposals for the Lower Clyst are abandoned, will the EA resume repair/maintenance of the Lower Clyst or will "benign neglect" become the watchword, ensuring further decline due to tidal influence?
5. We note there has been no attempt to accurately survey the area, the information in Ordnance Survey maps is at best limited, which leaves all open to conjecture!
6. Finally, we have had no actual proposal to buy/lease (or otherwise) the land in question, although allegedly some owners have. Can you please clarify the situation!

Yours sincerely,

  
For TOLLGATE FARMERS LTD

**55**

Dear Sirs,  
OBJECTION TO YOUR LOWER CLYST PROJECT

One of my main concerns of your proposal to flood the area surrounding the lower Clyst is the damage that i am sure will be caused to the ancient bridge.  
The bridge is an important landmark and gateway to Topsham from Exmouth, it is part of the character of the old town, and your proposal will put it under threat.  
Your proposal will result in millions of gallons of extra sea water passing in each direction at each tide, the bridge will act as a funnel point for this huge flow, causing erosion to the footings of the bridge, this the bridge was never designed to withstand.  
Protecting the footings with a rockwall may help, but it will be visually out of character with the ancient beauty of the bridge as we see it today, and may well be insufficient to save the bridge.  
There are huge areas of salt water mud in the Exe estuary, it seems crazy to me to want even more at the obvious risk to the bridge and the road link.  
It also seems equally obvious to me, that maintenance of the river bed is long overdue and needed now, dredging has not been carried out for many years and the banks need to be looked after.  
Many local people have made it clear to you, that they do not want this project, i hope you will listen to them,

Yours sincerely

[REDACTED]

**56**

Dear Sir,  
I live in Exmouth the largest town in Devon, and am a self employed, maintaining domestic property's, a large part of my work is in Topsham and Exeter. The proposed erasure of a roadway linking Clyst St. George with Topsham will add greatly to my travelling time, fuel costs and increase my carbon footprint. Many others also use this road on a daily basis to access Topsham and Exeter.  
I urge you to abandon the proposed flooding, road and new cycle path closure ,in fact forget the Lower Clyst Project altogether.

Yours [REDACTED]

**57**

Dear Mr Davies

I am writing to object to the flooding proposal and, in particular, the possible loss of the road across Topsham flats  
When I first heard about this, I thought they were kidding, but then found that this is now a serious proposal  
This is a significant link between Exmouth and Topsham without which amongst other things traffic congestion will worsen  
I agree with the Clyst landowners and Bridge Inn objections to the Lower Clyst Project, and look forward to seeing your responses to their detailed criticisms and questions.

[REDACTED]

[REDACTED]

**58**

This appears to me to be a total waste of taxpayers money. Surely with prime farmland in East Devon rapidly being eroded by an unprecedented onslaught from developers aided and abetted by EDDC this seems to be a ludicrous idea, especially in these times of austerity.  
Would not the money be better spent on providing badly needed flood defences to protect property?  
Words really do fail me!

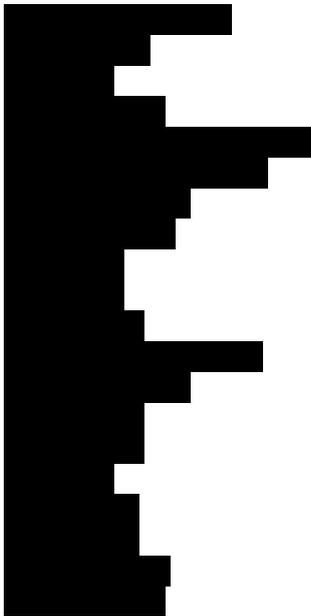
Regards

[REDACTED]

59

Dear Mr. Davies,

Please find attached a copy of the online response to the 'Managing Flood and Coastal Risk for the Exe Estuary' consultation from the following list of landowners, whose land makes up the Lower Clyst



All of the above oppose the strategy.

Regards,

--

Marketing and Events Manager  
Darts Farm, Topsham, Devon, EX3 0QH

*Extracts from completed questionnaire*

'(2)The EA consultation on managing flood and costal erosion risk around the Exe Estuary focuses on habitat and sea level rise. As sea level rises, the low water level will rise, though the high water level cannot rise due to the train line, therefore mud (habitat) will be lost. We understand that EU habitat directive (law) states that any mud (habitat) lost must be replaced even if there is already an oversupply of mud (habitat) and birds have more than sufficient/surplus feeding grounds. We therefore find ourselves potentially destroying good fertile agricultural land and putting people, property and essential infrastructure at greater risk in order to comply with an EEC directive regarding birds and bird habitat in the River Exe SPA.

The EA is no longer maintaining some of the banks along the Clyst, allowing the land to sit wet, reducing water storage capacity and increasing flood risk. The EA say it is only agricultural land and not their responsibility. We say the river is an interlinked ecosystem and the scheme would increase flood risk for property and infrastructure. For this reason, we object to the current policy of non-protection of agricultural land and the proposal to allow increased intertidal activity by removing riverbanks.

The consultation taking place deals with habitat and sea level rise and does not consider fluvial events and activity. The biggest factor currently affecting flood risk on the Clyst is fluvial activity. Therefore until it is fully understood how fluvial activity impacts it is impossible and not appropriate to be considering this strategy. The group's concerns are based on the following points:

**Requirement for Ecological Changes**

The proposals have potential to have very considerable impacts on the land, adjacent businesses, and community for many, many years to come. We fundamentally question the requirement for the creation of additional areas of intertidal habitat on the Exe and particularly given the consequences, require the EA to be very conservative and very, very sure of its requirement. In particular, the River Exe main channel was dredged for many years. Now that dredging has ended the profile of the channel has changed increasing the surface area of the intertidal habitat. Natural silting associated with sea level rise over the next 100 years will

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also increase this intertidal area. We presume this has been looked at and request the surface area changes from digitizing to be provided.

### **Alternative Areas of Mitigation**

The land between Turf and Powderham on the east bank of the Exe Estuary would potential provide a better site for mitigation than the Lower Clyst - it should come ahead of the Lower Clyst with regard to "Proximity" and also is lower lying and already in areas saline. This area was saline in the past and the estuarine alluvium would better support restoration. Please provide the technical assessment details for this area and confirm why this site has not been progressed.

### **Dredging of Channels in elevated mud banks within the Exe Estuary.**

Dredging of additional channels within the high mud banks of the central Exe Estuary would provide a greater lower intertidal surface area used for feeding. Please confirm whether this has been considered and provide technical arguments for and against.

### **Damage to Farmland - Precautionary Principle Must Apply**

The radical proposals to fundamentally change the ecology, hydrology and soil chemistry of areas of the Clyst Valley requires much more detailed consideration. Many of these changes such as hydrological changes and particularly making farmland saline may be irreversible. Both direct changes on scheme areas and indirect changes on adjacent land must be considered in full. For instance following the war many similar areas were drained to increase food production and who knows within a relatively few number of years political forces may change back again! We will need to be very sure of the impact of such radical proposals before progressing.

### **Existing Flooding Problems Ignored**

Any proposals for habitat creation must be considered following a detailed hydrological review and action plan to deal with the severe flooding problems of the Lower Clyst. The flooding had a considerable financial impact on businesses and the local community and must be addressed as a matter of urgency. It may be possible to prepare proposals for ecological change alongside flood mitigation proposals but the appraisal document does not indicate that this has been done. We understand that accepted good practice for Sustainable Urban Drainage and Catchment management requires that drainage at the lower ends of catchments should be drained as rapidly as possible and water high in the catchment held back (particularly the case in fast reacting catchments such as the Clyst). The proposals appear to counter this basic flood management approach. Presumably drainage schemes for projects such as Cranbrook have assumed this approach - Detailed explanation is required as to how these proposals follow this sensible approach.

(3) We require the following specific technical information to be able to consider the strategy:

1. Please provide mapping of future habitat loss.
2. Please explain why you wish to replace lost habitat (mud) with fertile grassland. Should you be looking to replace like with like same type of lost habitat?
3. There has been an increase in mud over the last 25 years since dredging the River Exe was stopped, causing the river to silt up. The creation of Goosemoor has also increased habitat (mud). It should be noted that Goosemoor is not being used much by birds as a high tide roosting location, suggesting there is no need for additional habitat.
4. Please provide information which considers the data on the increase in mud.
5. If additional habitat (mud) is required then why not dredge new channels in the Exe, increasing the valuable margins at low water level?
6. Powderham Wall would potentially provide a better site for habitat mitigation than the lower Clyst. Please explain why this location has not been included in the consultation.
- 6a. Has this location been sequentially tested against the Clyst for the most appropriate site?
7. If there are no suitable areas for appropriate habitat gain in the River Exe or Clyst, what other alternatives are there?
8. When will the fluvial activity study and consultation take place? Until the fluvial activity study and consultation has taken place, it is inappropriate to make any decisions regarding the current consultation. The EA should continue to manage and maintain all riverbanks on the River Clyst. Please provide us with the modeling data that disproves that the river acts as an ecosystem and the banks protecting agricultural land reduce the flood risk to property and essential infrastructure to the local economy. The river channel should be dredged to allow the marshes at Clyst St. Mary to drain properly. Currently, as this land is sitting waterlogged, there is reduced flood storage capacity and therefore higher risk of flooding.
9. What rainfall data figures did engineers use when designing Cranbrook?
- 9a. Have the most recent higher figures been tested in the modeling to check robustness?
10. Agricultural land has become completely unproductive in the Clyst near Clyst St. Mary because it is permanently waterlogged. Has food security, population growth and potential future policy change been considered and taken into account in current strategy?
11. What compensation or financial incentives are being offered to farmers?

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12. Is there a guarantee of funding for the raising of the Topsham road or building of a new protective road barrier?
13. What data has been used to assess water volumes that would eventually pass under the Clyst bridge at Topsham if a new bank/barrier was built? Please provide data.
14. What impact would this scheme have on Fishers Mill? Please provide data.
15. If the road was raised, how many culverts would pass under it and in what locations, and where would the new channels be located? Please provide data.
- 15a. What would the maximum eventual water flow volume be?
16. How will the Avocet railway line be protected?
- 16a. Who will pay for it?
17. Have raised ground water levels been taken into account in the modeling work done to predict flood risk?
- 17a. Has a sensitivity analysis been applied, taking into account global warming and the chance of higher rainfall levels?

(4) No

(5) All landowners listed below are opposed to the strategy recommendations as the consultation does not consider fluvial events and activity - the biggest factor affecting flood risk on the Clyst. Therefore, until it is fully understood how fluvial activity impacts, it is impossible and not appropriate to be considering this strategy.

This is a group of land owners whose land makes up the Lower Clyst Valley. The list of landowners include:

[REDACTED]

### 60

*Extracts from completed questionnaire*

'(3-5) The flooding would be an environmental disaster and this consultation exercise needs to be weighed more in favour of having to justify the proposals, rather than asking for reasons not to progress.'

[REDACTED]

### 61

Hello Martin,

Further to our phone conversation this morning here is my comment on the draft strategy. Like all the landowners I think we would prefer it if the land could be protected, but economically I can see this is no longer a viable option - so controlled inundation may have to be considered.

I will certainly be interested to talk further about the options in the Clyst Valley in the future.

Best wishes,

[REDACTED]

*Extracts from completed questionnaire*

(4) I am unsure of the effects overall of any breaching of the West banks of the Clyst. That is effects on the East banks and properties/roads downstream.

(5) As a working farmer in the Clyst Valley I would much prefer the land in question to be protected from flooding as it has in the past. However our banks are no longer maintained by the Environment Agency and the landowners affected have to study all the options available to them. Personally I am concerned of the effects of sea level rise in the Clyst Valley and I am keen to find out more about long term results of any direct changes that might be made .

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**62**

Dear Mr Davies,

No doubt you will be aware of this campaign by Darts Farm. I have visited Darts Farm (and hence signed up to their email list), but am not automatically supporting their position - partly because in East Sussex, near where I live, the EA has had a similar approach to the Cuckmere estuary for some years, and therefore I am familiar with the local arguments both for and against.

So I should be grateful to hear a summary of the EA's case, with particular reference to the main points mentioned by Darts Farm: a) need for additional bird habitat; and b) costs of "raising the road".

Regards,

[REDACTED]  
East Sussex County Councillor for Newhaven & Ouse Valley West.

**63**

Dear Sir

I am objecting to your plans to flood the river Clyst.....why is this so necessary?  
It seems very foolish and a waste of money and time too. Why does it have to change?  
Thank you for listening.

Yours sincerely

**64**

I am totally against the idea of flooding the fields at Clyst St Mary to create more habitat for wading birds. I love wild birds and have spent many hours observing them from Topsham and at the RSPB Centre at Darts Farm but I feel that to make even more areas at the expense of surrounding farmland is very unfair. We need grazing areas for farm animals in order provide local food and who wants to see cattle etc. kept in barns because there is no grazing land available. In this area the birds are well catered for so please keep the balance right. With the increase in rainfall that we are experiencing these days this area floods enough as it is so I think you should be trying to improve not make the situation even worse. To say that this land is low grade and not used for food production is totally wrong. That is saying that cows are low grade. How disgraceful!

Think again.

**65**

please do not go ahead with this sheme. Are the birds that you wish to create a bigger habitat for endangered? Pasture and green space is.

**66**

Dear sir

We would like to register our official opposition to the above project, and wholly agree with the Clyst landowners and Bridge Inn objection. The European Habitats Directive can clearly not be applied to this area and the environment agency appear to be working to a rule book - or perhaps you have Government or EU funding that needs to go somewhere? we look forward to viewing your response to the detailed criticism and questions presented.

**67**

Dear sir, I would like to register my concern over the proposals to flood the valley near Topsham it seems to be a wasteful and needless project with no real benefits for either birdlife or people.

**68**

Dear Martin

There follow some of my concerns for the 'Managing flood and coastal erosion risk for the Exe Estuary, draft strategy consultation document'. Although I am sure there are areas of concern in other parts of the document I am mainly concerned with the areas bordering the Clyst. My partner's family have lived in the valley for well over 100 years and are rightly concerned that it doesn't get messed up.

Looking at the old flooding photos I would suggest that to protect the C527 road for the next ten (at least) years would require less than 50 metres of bank to be raised. I would be very interested to know the cost comparison that must have been done of maintaining banks and raising by a few feet to protect road against raising the entire road.

I am absolutely amazed at the lack of data about what the Clyst actually does in terms of tide heights and flow rates. No data has yet been collected. How will anyone know how well or badly it is performing? I would strongly urge (as we have discussed) that monitoring is put in place as soon as practically possible.

I am shocked at how little monitoring of the sites has so far been planned. Mike Williams suggested yearly. If its that important shouldn't it be being carefully monitored and looked after?

Even if there is a need to create this habitat, it only needs (by law) to be created, not used. What's the point? More box ticking. It is very feasible that several millions of public money will be spent on some large muddy fields that have no birds or in fact anything else of use or interest in them. It doesn't matter if its euro money, we still put that money in to the euro pot. Just because money is there doesn't mean that you have to spend it.

There has not been enough (any?) thought so far about the impact of any fluvial events. These are forecast to be at least a much more regular occurrence than previously and so are of great concern. The main worry is the design of flood management systems upstream generally rely on fast draining downstream to allow draining of catchments. By flooding the fields willy nilly you will change the way the river responds to large quantities of rainfall potentially causing major problems. Although you may say it is returning to how it used to be, we didn't have to contend with the extra volumes from Sowton and Cranbrook back then.

All of your propaganda is apparently based on science but at best is very misleading. Your maps show potential flooding probabilities if there were no defences in place. There are defences in place. For the maps to be relevant all of the embankments would have to be destroyed.

You have said that the science tells you that dredging would not be effective in draining flood water more effectively. There must be some sort of blockage between Clyst St Mary and Topsham bridge for it to back up so much. By dredging you increase the potential volume of water than can be drained in a given time. Also the science behind the disturbance study is limited. This is only based on one report which has not been peer reviewed. In fact, the only relevant crit that I have seen is rather scathing. It asks some very interesting questions about the report and various assumptions within it that need answering. I enclose a photo of my own extensive disturbance study and an article from the RSPB website that both seem to contradict your 'science'.

I hope that you can give me some helpful and believable answers and I look forward to your response. At this moment in time I have far too many concerns to be able to give any support to this document.

Yours

[Redacted signature]

**69**

Dear Jane and Martin,

firstly, thank you very much indeed for the presentation you gave in Starcross on 21st February. The Councillors who attended were very impressed with the presentation, and felt that the evening went well. The feedback from residents who attended was also very positive.

The Parish Council Flood Prevention Committee has met since that event to discuss a response, which is as follows.

The Parish Council has some concerns about the implications for estuary villages of allowing Dawlish Warren to follow a more natural pattern. However, we recognise that maintaining its present form is probably not a practical possibility. We are reassured by the work that is going on to protect Starcross from tidal flooding, and we are very keen to work alongside the Environment Agency and other partners to ensure that necessary and effective measures are carried out to minimise the risk of flooding in both the shorter, and the longer term.

With many thanks,

[Redacted signature]

Clerk to Starcross Parish Council,

**70**

Dear Martin,  
please find attached my response to the consultation regarding flooding of the Clyst Valley.

Many thanks,  
[REDACTED]

*Extracts from completed questionnaire:*

'(3) You have refused to acknowledge results of important modelling research carried out by government-funded scientists and environmental experts who have confirmed that plans such as the ones proposed (e.g. flooding the River Clyst on the Topsham flats) is flawed and will result in irreparable damage to environment, residents, travel infrastructure and therefore people immediately located in the area and those who frequently use the road and make regular visits to and through that area.

The research model predicts that if the plans of the EA and RSPB go ahead then the road will flood (severely) approximately 10 times a year – this is not be acceptable to anyone. The cost of the road protection scheme to mitigate the flood risk (estimated £10 million) is also deeply offensive in such austere times as these. The number and variety of estuaries around this area already provide a rich and wide range of habitats for important bird species. It is therefore not necessary to create such mayhem for people or businesses by allowing the Clyst Valley to flood and to then waste money on poorly motivated schemes to protect the road when the whole scheme in the first place creates negligible benefit to birds and wildlife habitat.

(4) It is not enough to 'want to do the best by the wildlife' in the area (in real terms, a negligible gain) when it comes at such a cost to people, businesses and road networks .

For the rest of the explanation – see previous box above.'

**71**

Dear Mr Davis

I strongly object with the Lower Clyst Project, this will cause flooding, cutting off Topsham and many other problems .

I hope you will listen to the many voices who are asking you to cancel the project.

Regards  
[REDACTED]

**72**

Hello, please find attached my response form to the proposed Exe Strategy

*Extracts from completed questionnaire:*

'(3) At a Cost of 8 – 10 million to raise the road in the Topsham to prevent it flooding, the knock on effect of this to the residents and businesses of Topsham, It is a waste of Tax payers money of which I am one when this entire project is completely un-necessary'

**73**

Dear Mr Davies,  
DART BUSINESS PARK, CLYST ST.GEORGE, EXETER.

With reference to the above this communication forms an objection to your proposals for the River Clyst. The Dart Business Park is a mixed business and retail park which is located nearby the River Clyst and on the edge of the area formerly known as The Topsham Mud Flats. It covers approximately 18 acres

There is not an immediate problem with sea water level rising, but a pressing problem with rain fall and run off from the catchment in times of heavy rainfall.

The area floods during the winter when we have heavy rainfall, as has happened recently, and this area only just copes. The Topsham Flats take a large additional capacity for the run off and buildings just about remain above the flood level. This situation would be greatly relieved if the rivers and tributaries were properly managed and kept clear, but unfortunately the policy for conservation through neglect is not working as soon, in times of high rainfall, the area will be prone to more flooding, water retention for longer periods than necessary and soon damage to property.

The proposals to flood the area to allow birds more habitat is ignoring the local landowners wishes for the area to remain as it is and be managed to improve the current poor situation. The excuse of replacing bird habitat due to sea level rise in this way and at this location is not correct. The habitat that might slowly be lost if the sea level rises will be replaced along the low water mark as it moves upwards, if indeed it ever will. It is important to put the human species first when considering such proposals and it is vital for the economic success of the area for the Exmouth - Topsham Road to remain open at all times and your proposals do little for this. Furthermore if the area becomes flooded to satisfy a fictitious increase in bird habitat then damage to property and frequent road closures will soon become a more commonplace inconvenience and a very serious issue.

Yours Sincerely,

[REDACTED]

**74**

Bishops Clyst Parish Council have no overriding concerns with the proposal except for the fact that most, if not all, of the landowners concerned do not want or agree with it. There are varying views on how the erosion of the Lower Clyst banks will impact on the Upper Clyst at Clyst St Mary in light of the recent weather pattern we have experienced.

- At the Parish Council meeting held in January 2013 at which the EA attended, it was said that the risk of flooding in Clyst St Mary was 1:30 years, although this could now be less. This is of some concern as being too low and it is felt that the sooner money is made available the better and for improvements to the existing flood prevention scheme to be carried out as soon as possible. It is asked that money is made to the capital maintenance sooner rather than later and EA are asked to pressurise the Government to provide the funding immediately.

- It was intimated that an annual survey/scheme maintenance would be carried out in April 2013. The Council felt that this annual survey would be beneficial to the Council if they were invited to attend.

- Can the EA enforce the landowner to realign the River Clyst bed at the north side of the Roman Bridge where a build up of silt has re-directed the water flow under the bridge?

- Can the EA say if any sewerage from Cranbrook passes through the system in Clyst St Mary to the pump station in Blue Ball Lane?

Many thanks.

[REDACTED]

Clerk to Bishops Clyst Parish Council

**75**

Dear Sir/Madam,

I request that the entrance to the River Exe be dredged.

It is clearly potentially dangerous that tired fishermen and sailors congregate in shallow waters waiting for the tide to turn so that they can return to port.

It is also harmful to the environment that boats' engines are running while they wait.

There are extensive plans to develop Exmouth. Yet Exmouth's most important asset - its estuary - is neglected. This will be much regretted in the future.

Yours sincerely,

[REDACTED]

**76**

Dear Mr Davies,

It has come to my attention that the EA is planning to flood the Clyst valley. In the same way that Tobacco companies find research that say smoking is good for you, I am certain the EA can find research that says flooding the Clyst is necessary. The money to do this I believe could be better spent protecting communities from the type of floods we have seen in recent seasons.

I believe a plan such as this is for headline-news-grabbing and aren't-I-effective-at-my-job reasons.

At least delay the project for 5 years, save the money for flood protection in these difficult times.

Yours

[Redacted signature]

**77**

Dear Sir

I am writing in connection with the Environment Agency proposals to flood all the flat land in the Clyst Valley on high tides – the reasons behind this are undoubtedly political and economic, intrinsically interlinked, as well as equally environmental and practical due to global warming, rising sea levels and also it would seem due to the significant increase in development around Exeter from areas south of Tesco, new development and infrastructure at Sky Park through to Cranbrook where all surface water drainage is disposed in the direction of the Clyst estuary.

Therefore not only are the surrounding low lying areas affected by the tidal flows but also significant land drainage areas as seen recently in the heavy rains and saturated ground conditions.

I have lived in Clyst St. Mary for 15 years and we have obviously noticed the repeated flooding of the river onto surrounding flood plains and marshlands along the estuary, but this year the excessive rainfall has caused flood conditions exceeding the norm where the old Clyst St. Mary bridge was breached, it was up to the underside of the arches on the main road and the main A3052 road was flooded and the drains backing up at the lower end of Winslade Park Avenue.

These conditions were taking place when there were not specifically high tides.

Inevitably there is concern as clearly the infrastructure is not sufficient to accommodate these quantities of water, coming from both directions and all the development has not been completed yet.

It is understood that the Environment Agency is wanting to change policy to allow riparian land owners to accommodate flood water onto their land and to allow the levies to be breached, roads to flood several times a year and also drainage systems to back up.

In the 21st century where civilised society, technology and flood defence systems are supposedly at their most sophisticated, it does not seem responsible to allow flooding onto private land or the public infrastructure where the tax payer is then responsible for the clean up and continued repair to property, whether it be roads or drains or domestic residential property.

Notwithstanding the political will to allow flooding of private agricultural land in the Clyst Valley, the Environment Agency has given public reassurance to protect private property.

To this end I am requesting confirmation that due consideration is being given to the residential areas of Clyst St. Mary and in particular property in the lower residential areas of Winslade Park Avenue Clyst St. Mary with regard to sufficient and adequate drainage scheme to prevent the back up of foul drains which may cause flooding to properties.

The fields on the west side of the main A3052 road flood up to the boundary embankment and the surface water run off from Winslade Park Avenue, which is a huge catchment area and the main road, drain to the ditches surrounding this flood plain area. The proposed intention to allow further flooding of these areas from the Clyst in both directions, the sea and the river, will inevitably exacerbate these conditions to worsen flooding in the area.

From our records the Environment Agency confirmed the once in 200 year event for flood risk in tidally influenced areas for development in Topsham to be 3.82OD and the floor defences in Clyst St. Mary on the upstream side of the A3052 were established at 4.25OD.

However, I understand that the flood water breached the defences in Clyst St. Mary and the flood water level at the bottom of Winslade Park Avenue flooded the road by breaching the brook and drains backing up to 3.61OD approx.

Whilst this latter flood water was not a risk to property by flooding over land, the drains in this area did back up.

It is assumed that the Environment Agency is continually upgrading their records and statistics and projecting future flood levels based on both land flooding and also global warming.

## Exe Estuary Strategy Consultation Report

It is therefore requested if you are able to give reassurance on the adequacy of the main drains in the area to facilitate these demands, to confirm whether future remedial works are planned for the road drainage in the area and whether the future plans to allow additional flooding on land adjacent to the River Clyst can be accommodated without flooding the surrounding residential developments.

Yours faithfully

[REDACTED]

**78**

Re: Save the Clyst

I would like to express my opposition to the proposed scheme to flood the Clyst Valley. There is an abundance of wildlife in the area which is thriving. Scientific advice suggests there is no need for additional habitat for birds on the River Exe.

My family home is the cottage at [REDACTED]. The cottage has been our family home for almost forty years and the adjoining mill has been in the family for generations. My father ran the mill until 2005 and has since converted the mill to apartments. This was done at considerable expense and under the proviso that breakwaters were constructed around the perimeter of the property. To now propose to flood this area seems absolutely ludicrous and completely unnecessary.

I am wholeheartedly opposed to the scheme.

Regards,

[REDACTED]

**79**

Dear Mr Davies,

I attach my response form for this consultation. Please let me know if you have any difficulty opening it.

Yours sincerely,

[REDACTED]

*Extracts from completed questionnaire:*

(2) You appear to be considering the wildlife of the Exe, which is good, but not the need to protect agriculture and rural business in the area. The transport plans too for the rail links do not seem to have been sufficiently addressed.

(3) In the National Strategy of 2010, there is an undertaking "To avoid loss due to erosion of and/or manage risk of flooding to agricultural land." In relation to the Exe estuary, and particularly the River Clyst leading into it, this appears not to have been given adequate consideration.

(4) Dawlish Warren's shifting sands have continued to move massively even in the 30 years I have known them. There appear to be no long term plans to replenish or protect them. While I can understand this in terms of Dawlish Warren as a separate area in itself, underpopulated as it is and with a fragile presence anyway, the knock on effects of its loss are massive. The complete disappearance of the Warren would remove the incoming tidal protection for the whole of the Exe estuary. I understand from a river engineer, consulted 25 or more years ago in relation to a proposed marina development, that this would result in a bore similar in type (though smaller) to the one going up the upper reaches of the Bristol Channel. The Exe Estuary tides are very fierce and effectively it is a sunken valley rather than an estuary of the type seen elsewhere. A bore of even small dimensions would be disastrous for wildlife, people, business and agriculture on the banks of the Exe. Therefore the protection of those protective sands should be part of the strategy.

(5) Some protection for Dawlish Warren to help the sand build there naturally rather than disappear; protection for the villages on both banks of the estuary and in the Exe and Clyst marshes. A careful re-think of the possible role of the mudflats off Powderham, Exton and Topsham.

(6) The communities round the mouth of the Clyst and further up will be unable to continue to live, trade and carry out their businesses and agriculture if flood protection is not carried forward. This flies in the face of undertakings by the Environmental Agency to seek to protect such communities. The £8 million pounds or more that it will cost to raise the Topsham to Clyst St George Road and bridge could rather be put towards sea defences. There are many wild life areas of marshland in the Exe estuary and canal areas that could take up the wildlife needs caused by environmental changes if there were to be judicious protection rather than abandoning areas to the water or even actively flooding it.'

80

Dear Mr Davies

I am writing to confirm my objection to your proposal which you describe as the creation of 'inter tidal habitat for wading birds'. It could equally well be described as the destruction of habitat for the many thousands of birds which currently use the land that you are proposing to interfere with. Just three of the species which enjoy the land as it is are large numbers of lapwings and curlew - both of which provide impressive aerial displays - and huge flocks of brent geese which transform the landscape and skies as they fly to and from the fields between Fisher's Bridge Mills and Dart Farm.

Of course these birds are 'real' birds using an existing habitat that they obviously enjoy. Your proposal is for theoretical birds which may or may not decide to use the 'habitat' that you propose to provide for them. Do the birds for which you desire to 'create habitat' use the RSPB reserves at Goosemoor and Bowling Green? If not, why not? and if not could steps not be taken to encourage them to do so?

The EA proposals - which it would seem involve the destruction of 'inter tidal habitat' on the estuary of the river Exe which thus ( apparently ) triggers a requirement for the EA to replace the habitat that it has destroyed - WHETHER IT IS NEEDED OR NOT - appear to be based on predictions which may or may not happen. It seems to be in the interests of the EA to take these predictions as fact. Tony Blair did this when he supported the invasion of Iraq over the issue of weapons of mass destruction; it turned out that there weren't any .... discuss...

It is very easy for those with a vested interest and seemingly unlimited funds - not of course funds from their own pockets - to create compelling argument to do this, or do that ... because if we don't then ... the sky will fall down .. or whatever; and of course - if they do 'it' and the sky doesn't fall down they can stand back and tell us all how clever they are and how glad we should be that they saved us.

I think the EA should wait and see before taking the draconian action that they propose; it would seem to me that the EA should be dealing with 'threats' caused by heavy rain before they carry out work to protect us from the predicted rise in sea levels which, as yet, has not caused problems in Topsham - where I have lived since 1981.

Consider the Environment, not The Agency.

yours sincerely

[Redacted signature]

81

Dear Martin,

I attended the drop-in session at Matthew Hall. The handouts and posters were a lot more digestible than the official reports. Also, there was already recognition of local concerns about rainfall flooding of Clyst St Mary and the road across Topsham Flats. The staff were well informed and helpful in discussions.

On the whole I believe the strategy makes sense although there is a lot of detail to settle, and a lack of clarity on funding. I have been in touch with the "Save The Clyst" campaign. While I do not agree with most of the rhetoric, I do appreciate many of their concerns. I agree with your Agency that "do nothing" or "business as usual" is not a viable strategy.

Immediate concerns are:

flood protection for the Topsham Flats road,

flood protection for Clyst St Mary,

flood protection for the Bridge Mill property next to the Topsham Flats road bridge.

As an RSPB member and birdwatcher, I have been happy to see controlled flooding at the RSPB Goosemoor reserve and at the DWT Black Hole Marsh/Colyford Common reserve near Seaton. I believe that done properly, along with an enlarged bridge and raised road, that the seawall could be breached on the west (Topsham side) of the Clyst, above the bridge, and that it would reduce the risk of flooding. The big problem is that local landowners have not yet been persuaded.

Also, there does not seem to be much monitoring of flows and levels of the Clyst, nor local water table levels, even as construction progresses at Cranbrook new town. There are trees growing in the Clyst near the Exmouth road, which do appear to limit peak flows.

Hopefully the Agency and East Devon council can agree actions and fund them in good time.

Yours sincerely,

[Redacted signature]

**82**

Hi Martin, I have only just found out about this document. It is a shame that it is open to public consultation for such a short time. Since it is about a hundred year plan, one would expect longer than 40 days to read it , research and comment. Since I have had an hour in which to read it and reply, my comments are brief in the extreme!

I followed the instructions to reply online, but after filling the form it said I had to email it to you.. As it would not save, I have cut and pasted it. Perhaps more people might comment if the process was easier. I have a degree in Science but have found this process to be almost beyond me. I am now going for a lie down!  
yours, [REDACTED]

*Extracts from completed questionnaire:*

'(2) If Railtrack (or whoever is on control of railway!) does not maintain the railway adequately (they have been tardy in the past) there could be catastrophic changes in the estuary – which would cost a huge amount of money to put right or compensate for.

Any new building, homes or businesses, should be built with occasional flooding in mind. In many of the places described in this document – Clyst St Mary – for instance, new houses have been built and I have seen them standing in flood waters! This is foolish of the planners. If new places are built, at least build them on pillars/stilts/mounds, so that they will either not flood, or the flooding would not impact badly on the building. Like houses where all the accommodation is above a ground floor that is just for parking and can be flooded without huge loss of property. Also this means that people do not have to move out for months if they are flooded. If you live in a floodable area you can just ensure you have food stored and adequate energy for the flooded time. Other countries with far less money cope with floods because they think about it! Stop giving building permission to wealthy developers and individuals who somehow are not subject to the same rules as others, and build wisely! I live in a floodable area, that does flood annually. I ensure my actual house does not flood, I ensure all valuable articles are above the possible flood-line and have stabilised my boundaries with careful planting.

Another way of reducing the horrendous cost and heartache of flooding is to change our methods of disposing of sewage. What could be utilised to help the land is instead allowed to course thru peoples houses rendering them uninhabitable. There are so many other methods of dealing with this waste, why are we still using Roman technology!?'

**83**

Flooding the fields of the lower Clyst is madness. When the sea came ashore in the Eastern Counties, it took years to get it back into full production.

With ever heavier rain storms, and water coming down the rivers faster from all the new roads and roofs (Cranbrook) and Clyst Honiton bypass.

The real answer is to increase the water speed and the flow to stop flooding. Not to make flooding. With the ever increasing population in this country, we need more agricultural production not less!!  
[REDACTED]

**84**

Dear Mr Davies,

Please find attached my response to the consultation about the flooding of the Clyst Valley.

Kind regards, [REDACTED]

*Extracts from completed questionnaire:*

(3) You have refused to acknowledge results of important modelling research carried out by government-funded scientists and environmental experts who have confirmed that plans such as the ones proposed (e.g. flooding the River Clyst on the Topsham flats) are flawed and will result in irreparable damage to environment, residents, travel infrastructure and therefore people resident in the area and those who frequently use the road and make regular visits to and through the locality.

The research model predicts that if the plans of the EA and RSPB go ahead then the road will flood (severely) approximately 10 times a year – this is not be acceptable to anyone. The cost of the road protection scheme to mitigate the flood risk (estimated £10 million) is also deeply problematic in such austere times as these. The number and variety of estuaries around this area already provide a rich and wide range of habitats for important bird species. It is therefore not necessary to inconvenience people or businesses by allowing the Clyst Valley to flood and to then waste money on poorly motivated schemes to protect the road when the whole scheme in fact creates negligible benefit to birds and wildlife habitat.

(4) It is not enough to 'want to do the best by the wildlife' in the area (in real terms, a negligible gain) when it comes at such a cost to people, businesses and road networks.'

**85**

Mr Davies

I am writing to object to the flooding proposal and, in particular, the possible loss of the road across Topsham flats which is our main route into Topsham and Exeter.

The additional mileage for us to get to Topsham (at least a daily journey to post business items at Topsham Post Office) would be expensive in fuel and harmful to the environment.

I agree with the Clyst landowners and Bridge Inn objections to the Lower Clyst Project, and look forward to seeing your responses to their detailed criticisms and questions.

Regards

[REDACTED]

**86**

*Extracts from completed questionnaire:*

'I overlook the Bowling Green Marshes which are used by many thousands of birds. It would be a great shame if this became a salt marsh and destroying farmland up the Clyst would not benefit the community or improve habitats for birds.'

**87**

Dear Mr Davies.

We agree with the Clyst landowners and Bridge Inn objection to the Lower Clyst Project, and look forward to seeing your responses to their detailed criticisms and questions.

The project endangers property and vital roads without any apparent advantage. We do hope you will have the courage to reconsider.

Your sincerely

[REDACTED]

**88**

Dear Sir

I really cannot follow the logic of your proposal to flood the Clyst at Topsham.

Surely there is enough water, mud, and water meadow already, providing ample habitat for birds.

In these times of austerity, where is the funding for raising the road from Topsham?

Is it guaranteed that this will take place, or are you intending to cut off this route ?

If so, the repercussions for Topsham would be severe. Are you prepared to pay compensation to the residents and businesses for loss of trade and probable reduction in property values?

How is the only other route from Exeter to the East going to cope with all the extra traffic?

What about the extra time and fuel and carbon footprint spent going the long way round?

How can you justify destroying farmland in these times when it is more important than ever to feed the increasing population with quality home produced food ?

I could perhaps understand it if your reason was lack of funds to maintain flood defences , or to afford such measures as drainage and dredging. In that scenario, one would expect fund raising activities to preserve the amenity of a well used road.

However, if your reason is just for more bird habitat, then I think you should reconsider for the sake of the many local people adversely affected.

[REDACTED]

**89**

Hi Martin

I am strongly against the flooding of this area as I believe it demonstrates misguided priorities.

The ongoing horsemeat scandal shows the need for more assured home grown food- we should not destroy prime land which is urgently needed for food production.

The estimated spend of £8-£10 M could only be funded from the public via increased taxes. In the current economic times people are having to choose between eat or heat - any additional burden on the public cannot be allowed to happen

Put people before birds

[REDACTED]

**90**

Dear Mr Davies

My husband and I, who live in Topsham, have followed this campaign with interest.

We thoroughly agree with the Clyst landowners and Bridge Inn objection to the Lower Clyst Project.

Opposition claims that flooding prime farm land is “madness” at a time when food production needs to rise to feed a growing population – not only that, but surely we need to feed our population with British produce rather than risking another ‘scandal’ such as the recent horse meat debacle. The fields which you propose to allow to flood feed good British cattle, rather than continually importing from overseas.

I would have thought that there are far better and more urgent ways in which to spend a possible £10 million for a ‘protection scheme’ for birds when the estuary all round Topsham seems to have plenty of land already owned by the RSPB for the protection of birds – surely the protection of people is rather more important in England in these years when jobs are scarce and austerity is biting.

So, we would both like to register our total disagreement to your plans.

**91**

Please don't do it! The river Exe has enough tidal waterfront for wading birds.

Why upset residents, businesses and tourists? And, who would pay for it?

Local taxpayers?

Regards

Exmouth resident.

**92**

Dear Mr Davies,

We wish to register our objection to plans which I understand are proposed to flood an area of the Clyst bordering on Darts Farm.

We consider this to be an outrageous waste of taxpayers' money.

To be destructive of fertile productive land.

That the Exe habitat for wildlife is already lovely, delightful and extensive enough.

People before bird habitat please.

Yours sincerely,

*Also Extracts from hand written questionnaire:*

(2) You have missed the fact that we are in economic emergency and cannot and should not be planning to use taxpayers money on wading birds but on people!

Valuable productive agricultural land would be sacrificed for birds – not acceptable.

(3) The consideration of whether the country can afford the Clyst proposals do not seem to be addressed.

(4) The Clyst already has wonderful wild life.

Proposal to flood greater area – would take valuable farm land which produces local food we value more than wading birds.

Totally wrong to spend money when country bankrupt on road and bridge expenses for the sake of wading birds.

**93**

Dear Martin Davies

We agree with the Clyst landowners and the Bridge Inn objection to the Lower Clyst Project and look forward to seeing your responses to their detailed criticisms and questions

Yours sincerely

**94**

Dear Mr Davies,

I've just received an email from Darts Farm asking me to send you an email to "Save the Clyst" by preventing the managed realignment scheme to go ahead. I completely disagree with Darts Farm's stance on this project and am in full support of the scheme going ahead. I'm surprised and disappointed by their blinkered view, as I had thought they were a more enlightened business, although I do appreciate this could mean a loss of revenue for them (if they were adaptive though this doesn't have to be the case). I have responded to the online consultation re management of the Clyst positively.

I also think they are misleading the public by stating that through opposing the scheme the Clyst will be "saved"... when it seems patently obvious that their motivation is purely financial. I would consider the managed realignment of the Clyst to be its saving grace. As a local resident I look forward to a more natural, diverse and enjoyable Clyst when the scheme goes ahead. Good luck with your efforts in recreating valuable intertidal habitat that has been lost for generations. Kind regards, [REDACTED]

**95**

Mr Davies

I understand that the Environmental Agency together with the RSPB is proposing through changes to the management of the river Clyst to alter the farmland at Topsham / Clyst St. George to become salt marsh / tidal mud flats. I wish to voice my complaint against this plan.

I have several reasons:

I understand that through these changes, the land will flood more frequently both from heavy rainfall and increased tidal flow, becoming more salty making it unusable for pasture or agriculture and therefore destroying the current food production of this land. It will also affect what is currently a very pleasing piece of landscape with excellent views from the road, the local Inn and the leisure area attached to the significant shopping complex. We all know that estuaries and marshes can be pretty when full of water but become rather a dismal view when the waters recede and reveal the mud.

I also understand that the road across the flats will be liable to flooding during numerous spring tides throughout the year, disrupting traffic flow and forcing much more traffic onto the already busy Clyst St Mary /M5 route.

Further, I believe there is some degree of intention of allowing the road to deteriorate and thus possibly becoming unusable. This would cut Topsham off from through traffic which I'm sure would lead to many of the local businesses failing due to the loss of passing trade. It has been the pattern for many a bypassed town.

The purpose of these changes is advised to be the creation of an altered habitat for aquatic bird life. This would no doubt be an advantage to a handful of bird enthusiasts. I'm not an environment scientist but have sufficient background to believe such changes will not attract new birdlife to the greater Exe estuary, merely that some of those birds already using the area will spread out a bit and perhaps be positioned a little more conveniently for the aforementioned minority group of bird watchers. Effectively you are proposing replacing farming and commercial interests with some 'free' leisure activity for a few enthusiasts.

In short, the plan appears to be; destroy the current perfectly good pasture and bird habitat at the cost of farming and a nice view for the general public, potentially destroy the livelihoods of the local businesses and create additional peak traffic issues in an already poorly provided road network. All this, to satisfy a group representing a minority of people who have an inordinate lust for looking and pointing expensive optics at birds.

No thank you, please leave the flat as they are and continue to provide what waterway management is needed.

[REDACTED]

**96**

**OBJECTION TO LOWER CLYST INTERTIDAL HABITAT CREATION**

As a land owner of 52 acres (20 hectares) affected by the above scheme I do not agree to the creation of new intertidal habitat which is an irreversible decision. Previous experience show changes in the level of the river compromised and caused collapse of part of the east bank during the last 50 years. Once the west bank is breached I have had no reassurance the east bank of the Clyst will survive even for the fifteen years of so that it will be maintained. Water pressure is required to keep that type of bank whole. The breaches proposed on the west bank may also change the river flow, silt will build up and drainage from the marshes will slow down. This would cause frequent flooding of the C527 road before it is raised or protected. Following the destruction of one existing habitat for another, there will be no fresh water. I see no proof given that the intertidal habitat created will be similar to the part of the estuary which it replaces. The depth of water at any time will not be recreated on this site. If there is still any chance of cattle grazing it will be too dangerous for man or beast and no fresh water for the animals to drink.

**97**

Dear Sir

I am writing to ask why the Environmental Agency considers this project to be worthwhile when there is so much opposition to it within the local community?

Also, I am intrigued as to where the money will come from in order to finance such a project when the resources are currently so stretched.

I look forward to your response.

Regards

**98**

Dear Martin,

once again another horror story re your flyer. I strongly oppose any changes to the land around the river clyst. We have enough problems with excessive irresponsible housing development around Topsham the long term environmental and social consequences we have yet to suffer

yours truly

Please could your office provide a response to

**99**

I write in support of the protest against the absurd proposal by the Environment Agency to allow the river banks upstream of Topsham to be breached. The case is not supported by legitimate scientific investigations and no credence appears to have been given to the needs of PEOPLE as against those of WADING BIRDS. This land has been farmed for generations and that is the best possible use of habitat particularly with the expanding population we are facing. In addition the road is an essential lifeline and commercial artery. Survival of a viable human entity is vital.

**100**

Dear Martin Davies

We understand that it has been suggested that part of the Clyst river valley should be allowed to flood to create additional habitat for wading birds. As we do not see the need for this proposed scheme, please register our opposition.

Kind Regards

**101**

Hi Mr. Davies,

I refer to the Environmental Agency's reported plans for flooding the River Clyst. I live in Ebford and find it very surprising that I have learnt of these proposals only through a poster at Dart's Farm. Surely the Agency should be proactively consulting/notifying residents in the area? Suffice to say I would be totally opposed to any scheme that involves flooding any land in this vicinity, particularly when such a scheme is prima facie promoted on the sly. I would be interested in the Agency's response to these concerns.

Kind regards

**102**

There is absolutely no sense in wasting eight million pounds, in a time of severe recession, just to accommodate wading birds. The Devon people are quite used to wading themselves after the rains of last year. Also, the birds are capable of flying as far as the Somerset Levels, where they will find acres of once productive farmland now under water! No need to waste money flooding even more land: mother nature will do it for free!

Darts Farm produce is delicious and enjoyed by many. People value locally produced food .

This scheme would be highly expensive . I am sure there are better schemes to waste your (sorry, OUR) money on, such as helping children and the sick and elderly.

[REDACTED]

**103**

I object to the flooding of the land between Topsham and clyst st Mary it will ruin the great farm land that is already there, and it will mean we will not only lose the cycle path which has been years in the making but also one of the main routes to Exeter.

Thank you for taking your time in reading this email

[REDACTED]

of lymptone

**104**

I wish to express my deep concern over the proposed flooding go the Clyst Valley.

**105**

If this area (the Exe estuary) is as important as we are told it is, what guarantee is there that this rather fragmented (a bit here and a bit there) approach will retain the features which currently give the estuary its "environmental" value?

For example the decision to flood perfectly good grazing land along the Clyst valley in order to provide further habitat for waders is crazy. particularly at a time when it is becoming increasingly obvious that Devon should be working towards exploiting its greatest asset which is the ability to provide very high quality food in the form of cattle and sheep.

The Dutch, long before they had the engineering and control facilities and which are available nowadays, began to reclaim vast areas of land from the sea to the extent that more than 15 million people now live below sea level (some more than 10 metres below).

Why not build a protective dyke out to sea looping round (perhaps from east of Exmouth to west of Dawlish) to protect the status quo of all the existing desired features of the estuary by virtue of locks, sluices and pumps which would control the tidal flow and water levels within the designated area. Maybe a road along this dyke could link the Teignmouth area with East Devon, maybe the power and the reliability of the tides could be harnessed in such a system to generate electricity. Would the cost be very much greater in the end?

[REDACTED]

**106**

Hello Martin,

Having listened to the news and discussion on BBC Radio Devon earlier this week, I would like to express my opposition and concern about the proposal to flood the lower Clyst valley area between Topsham and Darts Farm, with the aim of creating more wetlands to replace some lost by rising sea levels and loss of habitat in the River Exe.

What I cannot understand is how the proposed scheme would make extra habitat that would be beneficial to birds in the long term. With apparent rising sea levels and other factors such as increased flooding, I would imagine that some other local areas that were slightly above sea level are now becoming new wetlands automatically. Actually it could be the case that more salt-marshes and wetlands are being created than lost in the local area. As a person who has spent over half of my lifetime in this area, I do enjoy the coastal scenery and wildlife around the Exe and Teign Estuaries and support many local farm producers and businesses. However I cannot see the logic in the argument of increasing the amount of salt-water wetlands by flooding an area of mixed farmland and spending millions of pounds in changing the surrounding roads when this can put the local economy at risk, and cause the loss of local farmland.

I would imagine you are aware of the areas upstream of Topsham (on the Exe) and also above Buckland (on the Teign) which would automatically become new salt-water wetlands as sea-levels rise. Surely the Environment Agency should look at securing these sites so that they naturally become wetlands, rather than

## Exe Estuary Strategy Consultation Report

spending extra money synthetically creating man-made wetlands in an area which would benefit more actually by better drainage, as shown by the recent flooding around Clyst St Mary.

Therefore I oppose the scheme to flood the lower Clyst Valley.

Kind regards

[REDACTED]

### 107

Dear Mr Davies

I write as the [REDACTED] for Topsham, and as a resident, to object to this proposal.

I have seen no compelling evidence to support your scheme, and in fact many arguments stating that it is flawed. My main concern is the dire economic problems that this scheme would inflict on Topsham and the surrounding villages, especially from the loss of the road from Clyst St George to Topsham – a major thoroughfare.

No one seems to be in favour of the scheme, and may I suggest that it is dropped, in order to save time and money.

Yours sincerely

[REDACTED]

### 108

Dear Sir,

I would like raise a formal objection to the proposed flooding of the Clyst valley in order to create further habitat for Geese, Godwits, Curlews, Greenshanks, Dunlins etc The existing habitat is quite sufficient and the likely levels of expense make this whole proposal almost comical. I haven't even started to consider the level of disruption the raising of the road is likely to cause.

[REDACTED]

### 109

Dear Sirs

I would like to make a formal objection to the proposed plans to flood the Clyst Valley, Topsham.

I have lived in and around Topsham all my life I think the proposition to flood this area would not only be a complete waste of money but would also ruin an unspoilt area enjoyed by many people. The effect of raising the road between Darts Farm and Topsham would also cause huge disruption to people such as myself who cycle to work between Topsham and Exmouth.

I sincerely hope that common sense is applied to this proposal

[REDACTED]

### 110

Dear Martin,

I wish to register my opposition to the re-flooding of the Clyst flood plain.

I run a business close to the proposed flood area, during the recent flooding and road closure my business had water coming up through the floor, even though we are above the proposed re flood area. I believe that if this proposal goes though, and the land is allowed to flood more regularly, The Oak Loft will have water damage more often. This is totally unacceptable and I would have to seek compensation from which ever agency was deemed responsible.

Please do not re flood the plain!

Very Many Thanks

[REDACTED]

### 111

Dear Mr Davies

I live close to the area in dispute, and although I appreciate providing habitat for birds is valuable, my understanding is that the scientific evidence does not support this project. It saddens me that the road through the land will be jeopardised. I hope you can all reconsider the plans

Yours sincerely

[REDACTED]

112

Dear Martin

**Managing flood and coastal erosion risk for the Exe Estuary  
Draft Strategy Consultation Document January 2013  
RSPB Comments**

Thank you for sending the RSPB a copy of Managing flood and coastal erosion risk for the Exe Estuary Draft Strategy Consultation Document (January 2013). We have the following general comments to make on the Draft Strategy, and attach at Annex 1 our detailed comments on the associated Managing flood and coastal erosion risk for the Exe Estuary SEA Environmental Report (January 2013) (the Environment Report), which in places help explain and add detail to our general comments below.

1. We welcome the Strategy's identification of compensatory habitat creation measures, to seek to avoid adverse effects on the Exe Estuary Special Protection Area (the SPA) and Ramsar site and the Dawlish Warren Special Area of Conservation (the SAC). However, we are concerned that these may not be adequate in terms of delivery timetable, scale and nature, to enable conclusions to be made now that the coherence of the Natura 2000 Site (and Ramsar site) network is protected and that their deterioration will not be avoided.

2. It remains Defra's position that the EA is responsible for addressing the totality of coastal squeeze losses to Natura 2000 sites. We therefore consider that the Strategy should address all predicted losses to the SPA, Ramsar site and SAC resulting from sea level rise. The Strategy is the logical and indeed in our view the only appropriate vehicle to identify all habitat losses to these sites, including those that are uncertain in the medium and long term and all 'natural' losses, alongside the most logical habitat creation opportunities that would be needed to avoid adverse effects on the protected sites, and their deterioration. In failing to do this, it risks failing to comply with Articles 6 (2) and 6(3) of the Habitats Directive.

3. The Strategy should in our view plan to compensate through replacement habitat creation for all losses of important habitats resulting from the Strategy, ie. all BAP habitat losses should be offset, in addition to SSSIs and NNRs.

4. Two locations are identified in which new intertidal habitats will be delivered: the Lower Clyst valley and the Kenn valley, and estimates are given for the areas of habitats that each of these sites could generate. The RSPB supports habitat creation in these locations – indeed, we have already created intertidal habitat at our Goosemoor nature reserve in the Clyst valley. However, there is limited assessment of the likely ecological function of the habitats created at these sites in relation to SPA and Ramsar site features. Given that both sites are by their nature linear offshoots of the main estuary and the predicted saltmarsh predominance, these schemes would be likely to provide a different function for the ornithological features of the SPA and Ramsar site than the open intertidal mudflats that are being lost to coastal squeeze.

5. In addition to ecological value, there is uncertainty about how secure the delivery of the selected compensation sites is, and therefore a question as to the extent to which they can be relied on to enable a conclusion that the coherence of Natura 2000 is protected.

6. It is in our view disappointing that open foreshore options, notably at Powderham Banks, have been ruled out as inter-tidal habitat creation opportunities at this stage. Land to the east and west of the railway line at Powderham Banks would, given its size and location relative to the existing estuary habitats, appear to offer good potential for functional replacement for ornithological features. We acknowledge that this would require works to secure the ongoing protection of the railway line, which would no doubt carry substantial cost. However, given the scale of the habitat potential (from Appendix D), and the complexities associated with the current proposed habitat creation opportunities, its costs may not end up being that much greater per hectare. Given the scale of losses predicted to SPA and Ramsar site habitats over the full Strategy period, particularly if the current scale of medium and long term 'uncertain' losses continue to be predicted, and 'natural' losses to sea level rise are also addressed through the Strategy (to avoid site deterioration), it seems likely that this habitat creation opportunity would be needed in the medium to longer term. Given a need, identified in the Draft Strategy, for major investment in Powderham Banks to protect the railway in the short, medium and long term, if it is likely to be needed as a habitat creation in the future, it would make sense to coordinate planning to protect the railway line, and to create habitat, now. In essence, if a decision is made now to upgrade Powderham Bank, is it not likely that that investment precludes future realignment within the Strategy period?

7. We make some comments on the Draft Strategy's proposals for Dawlish Warren in the appended table at Annex 1. It is essential that any planned change to the Warren takes full account of its impacts on the Exe Estuary SPA and Ramsar site, as well as to the SAC. The appropriate assessment will in our view need to consider how future changes to the Warren resulting from the Strategy will affect the SPA and Ramsar site. For instance, will it lead to increased sand encroachment into the mudflats in the Bight and elsewhere to the north of the Warren, and if so what will the effects of this be on feeding and roosting waterbirds? It is also important to relate planned physical changes to the Warren to its use by people. Recent work undertaken on and around the estuary identifies that recreational activity is affecting the use of the estuary by wintering waterbirds, and that, unmitigated, this is likely to get worse. Future physical changes to the Warren will affect the way that people access it and use it, and the Strategy and its appropriate assessment should in our view include consideration of how its use by people will affect the qualifying features of the SAC as well as the SPA and Ramsar site, and may need to consider access management infrastructure.

8. The Exe Estuary Flood and Coastal Erosion Risk Management Strategy DRAFT Habitat Regulations Assessment Screening Report December 2012 is a helpful screening report, which identifies that many of the proposals in the strategy are likely to have, or may have, a significant effect on the SPA. However no draft appropriate assessment, or information to inform one, has been provided at this stage and this in our view is a major omission. The appropriate assessment will need to provide information to inform the Strategy's anticipated impacts on the qualifying features and conservation objectives of the affected sites. It will also need to fully assess the ecological value of these measures and the level of confidence that can be placed in their being delivered in a timely manner. Without sight of that assessment, it is not possible to give a view as to the value of the Lower Clyst and Kenn valleys as compensatory measures, nor as to the ecological acceptability of the Strategy. We would be grateful for sight of the draft appropriate assessment in advance of the final publication of the Strategy.

9. It does not appear to be recognised that Habitats Regulations 262 Considerations of overriding public interest (including there being no alternative solutions) need to be satisfied in addition to Regulation 66 Compensatory measures in order for the Strategy to be adopted. The RSPB has not taken a view as to whether the Strategy satisfies Regulation 62.

10. We welcome the proposed approach to Monitoring, as set out in Chapter 13. This, in our view, offers some reassurance in relation to the uncertainties regarding delivery schedule, nature, quality and ecological function of compensatory habitat. In particular, the Potential Responses given in Table 13.2 in relation to inter-tidal habitats of *Review and if necessary revise suite of strategic options related to habitat compensation if observed changes indicate detrimental effects on qualifying features* and in relation to SPA bird populations of *Review and if necessary revise suite of strategic options related to habitat compensation if observed changes indicate detrimental effects on qualifying features* are helpful. However, the Habitats Regulations require avoidance of an adverse effect, rather than waiting for harm to occur before responding to it. It is therefore necessary for monitoring to enable harm to be anticipated (eg. from monitored change starting to divert from anticipated change) and amendments/additions to the habitat creation programme to be adopted ahead of harm actually taking place. It is in our view necessary for those amendments/additions to be identified as explicit contingency measures, and for their triggers, to be established as part of the Strategy. Furthermore, should monitoring identify that the assumptions on which the Strategy is based, eg. predicted rate of sea level rise, do not reflect reality, it would in our view be necessary to review predicted rates of habitat loss and the habitat delivery programme, even if that review is not yet required by the Strategic Monitoring Plan.

I hope that you find these comments helpful.

Yours sincerely  


Senior Conservation Officer

**113**

Martin,

Please see below my submission to the consultation on the Lower Clyst project.

My farm is in the Clyst Valley and not only is it my home and business but, more importantly, it is my passion and the thing I have spent my whole life striving to improve. My number one objective has been to enhance the viability and heritage of the business. In short, it is my life. My comments below are made against this backdrop.

1. My strong preference would be to return the river to how it was in the seventies and early eighties where the river was regularly dredged and the banks effectively maintained. This led to a fantastic environment which allowed both livestock and wildlife to flourish. The fields bordering the banks are all now lying wetter (for whatever reason) and this has already had a detrimental impact on my farming business. Indeed, we would be keen to raise all our river banks by two feet but we understand permission for this would not be forthcoming at this time.

2. If 1. is not possible then I am prepared to approach any proposals with an open mind.

Regards

[Redacted signature]

**114**

Separate petition organised by Dart's Farm and forwarded.

**115**

*Extracts from completed questionnaire:*

(3) 'This is a one-sided decision. Please take into account peoples' livelihoods, the access to Topsham, possible flooding to nearby properties etc.

The wildfowl seem quite happy with the land as it is.'

(5) I am a great lover of the natural environment, flora and fauna but totally oppose the proposal to flood the area around the Clyst. This is valuable farmland and as such the owners work in harmony with the wildlife. From time to time it is possible to see an abundance of Brent Geese etc feeding in the area so why flood it? The wildlife are happy with the area as it is and the farmer is accommodating to the wildlife as well as his/her stock. There are plenty of sites either side of the river Exe to allow for further feeding/nesting etc. without flooding the area around the Clyst at Topsham.

Flooding this area will cut off vital routes between Exmouth and the east Devon area with Topsham and beyond. Any proposal to raise the road level would cost a ridiculous amount. This area has a light industrial site, Dart's Shopping centre etc employing a large number of people. These businesses are vital to the local economy and for employment and any suggestion of flooding the nearby land could cut them off completely. Let us continue to live in harmony with the local industries and the wildlife that frequent this area.

[Redacted signature]

**116**

With reference to the above proposed scheme to flood the Lower Clyst Valley. My family have owned [Redacted] for over 100 years.

I worked the mill for 40 years and in 2005 sympathetically converted it at considerable cost to apartments. The mill cottage has been in our home for 40 years, [Redacted] my sons, and the other apartments are let. If this scheme is allowed to go ahead it could well render the whole property uninsurable and thereby worthless.

Part of the planning permission was a directive from the EA to raise the levels of the wall and bank around our property. This we did at considerable expense. It is not a problem to keep flood water from overlapping the defences but as witnessed in November 2012 it is impossible to stop the flood water through the ground inside the bund.

This undoubtedly would happen if this ridiculous scheme was allowed to go ahead and I would hold the EA 100% responsible.

I have minutes from a meeting dated 1.6.06 - question 16 - what if one or some landowners are not interested in entering into agreements?

Answer: No one will be forced to do anything against their will. The Environment Agency could not allow removal of banks that would have an impact on someone not in agreement.

I am not in agreement.

Yours sincerely

[Redacted signature]

**117**

DARE response

*Extracts from completed questionnaire:*

(2) We do not consider a thorough evaluation of major damage/risk to people, their property, infrastructure and businesses have been taken into consideration for the longer term.

(3) DARE believes the sandspit is primarily a flood and sea defence protecting the Estuary's towns / villages and all riverside settlements along the Exe. We see its secondary role as a Tourism amenity ie Beach and Nature Reserve.

We have not seen or heard any sound reasons not to protect the sandspit for the long term. It would appear there are two main drivers being used to support no long term protection for this area. Firstly, it has been stated by Natural England "the Dune System is failing". This situation is a somewhat obvious statement. This Dune System is different due to the fact the mobile dune is fixed. This has been fixed for at least the last fifty years, so not surprisingly this falls short of Natural England's recommendations / aspirations. It has been stated the Gabion Baskets are now exposed and are looking unsightly; this problem could easily be resolved during the beach recharge process. This process we fully support.

Secondly, there appears to be a transfer of responsibilities from the Environment Agency to assist in financial savings. This will undoubtedly lead to more financial responsibilities and additional physical responsibilities to Local Councils, Businesses and Individuals. This has been mentioned at recent meetings with relation to community volunteers operating floodgates, Dawlish Golf Club being responsible for Gabion Baskets at the back of the Golf Course etc

(4) We do not consider recommendations correspond to the SMP2 "Hold the Line".

(5) We do not support removal of Gabion Baskets because what happens in the first twenty years dictates the future of the sandspit. It is clear due to the need for a new defence stretching inland towards the Visitors Centre; erosion at mid point seems to be anticipated, possibly speeding up the demise of the sandspit.

(6) We consider too much emphasis is given to Natural England and RSPB requirements in preference to mankind.

**118**

Dear Martin,

I wish to object to the Exe estuary strategy consultation dated January 2013 for the following reasons.

1) the science doesn't support it. Much of the habitat loss attributed to sea on the airlevel rise will be at some point in the future and is therefore totally hypothetical. We have no idea how much sea level will actually rise: making a guess is not exactly methodical.

2) the fact that you are unable to show us where the habitat is lost, shows that much of your argument is in fact hypothetical.

3) it's very convenient for you to interpret the European habitats directive to the letter. The fact that it doesn't specify need to replace habitats, is an apparent excuse for you to make a grab for the lower Clyst Valley. Shabby.

4) as above; the birds on the Exe estuary are in fine form, and under no pressure whatsoever. You have tried to represent the situation otherwise.

5) the Disturbance Study which you Eare using as part of the information to support your project is laughably amateur. We request that you put it to peer review, and debate it publicly with our expert.

6) a previous document proposed Powderham to mitigate your alleged habitat loss. It is nearer the estuary, and more geologically similar. Why has it quietly disappeared when apparently preferable for many reasons? I therefore object on the grounds that decisions you make are not transparent.

7) despite your protestations to the contrary, the scheme you propose does threaten the road across Topsham flats. Not only do you have no finance in place to mitigate the threat, you have absolutely no prospect of it either.

8) you will be flooding productive farmland.

9) the scheme only takes into account your narrow interest of a particular faction and their obsession with intertidal habitat. It takes no account whatsoever of the other requirements of the real world, such as infrastructure, farming, etc.

10) you have wasted a spectacular amount of public money on a scheme driven by dogma.

11) every time the EA gave us a reason for the scheme, and we effectively obstructed it, you changed tack. I object on the grounds that you have been spectacularly dishonest with us over several years.

12) I have lost count of the number of times I have heard the mantra of "habitat creation". This is Orwellian newspeak for the destruction of a rich, diverse, and mature habitat that we already have here.

13) and the biggest lie of all: "and if the landowners don't want it, it won't happen". That's a whopper, and from a so-called professional organisation publicly funded I find quite shocking.

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14) you seem to have no regard for the possible economic consequences of this. It really is a case of birds being more important than people, isn't it?

15) I would go on, but I can't be bothered, because you seem not to be listening to us. So much for the democratic process, and the rights of people who actually own the land.

I look forward to seeing the results of an analysis of this consultation. Please keep me fully informed as to the next step.

Sincerely

[REDACTED]

**119**

Dear Sir,

I regret that I cannot think of a more irresponsible scheme than that proposed for the River Clyst and its environs. Would you please record my vote as being most definitely AGAINST your suggestions, and a further request that you re-consider the matter, bearing in mind the valuable dairy and beef land that it is suggested should be given up, if your proposals as they currently stand, were to be carried through. Please reconsider.

[REDACTED]

**120**

Dear Mr Davies,

My attention has been drawn to the EA proposals to flood farmland adjacent to the River Clyst to create more habitat for wading birds.

It is also suggested that the road between the Bridge Inn in Topsham and Dart's Farm would have to be raised at the cost of several million pounds, no doubt to the Devon taxpayer.

I live in Alphington and will have to put up with several hundred houses built on prime farm land on the edge of the village. This land is owned by Devon CC who are trying to get as much cash as possible from the sale of the land.

You should not be flooding good farmland unnecessarily for the sake of a few birds when there are large areas of estuary mud close by.

I am therefore opposed to the EA scheme to flood the rich farm land adjacent to the River Clyst.

regards

[REDACTED]

121

English Heritage Response

Dear Mr Davies

Thank you for inviting English Heritage to comment on the draft Exe Estuary Flood and Coastal Erosion Risk Management Strategy. Please find our comments below.

### **A Draft Strategy Consultation Document SEA**

1. Paragraph 10.1.2 is a useful summary but please could you extend the caption to Figure 10.1 to mention that it depicts only designated historic environment assets. We suggest using a different symbol for Scheduled Monuments as the one used does not show up clearly unless there are several monuments close together. It would be useful also to show the Conservation areas, using inset maps if necessary.
2. 10.1.3 The section summarising the Historic Landscape Characterisation is very brief and would benefit from some expansion. It is not really clear from the summary whether this has been a useful approach (as opposed to using data from the Historic Environment Record), though the more detailed Appendix is less equivocal.
3. We are pleased to note that the proposals will have, in general, a beneficial impact on the built environment. We note that there are several areas where non-beneficial impacts are anticipated and welcome involvement in the development of schemes in these locations.
4. We note that managed realignment with a regulated tidal exchange scheme is proposed for the Kenn Valley, before 2030. The draft acknowledges that this could have a substantial impact on the Grade II\* Registered Park and Garden. We are concerned about the scale and nature of this potential impact and request that detailed discussions are held with English Heritage as well as with the landowner. The Garden History Society is also a Statutory Consultee for Registered Parks and Gardens and should also be consulted. The early history of reclamation at Powderham adds to its significance and the reclaimed land may bury and preserve sites and stratigraphy of archaeological and palaeoenvironmental significance.
5. The Lower Clyst marshes are also historic landscapes with archaeological and palaeoenvironmental potential.

### **B Summary Appendix of potential Managed Realignment sites**

6. Table 1. We note that non-scheduled known sites are categorised as C. Would it not be appropriate to give these a B category, in common with Local Nature Reserves?
7. In Table 1 of the Summary of potential MR sites there is no entry for the Registered Park and Garden at Powderham. Please could you update this table and also check the other entries.

### **Appendix C Historic Landscape Character Assessment.**

8. The text would benefit from some expansion to give more detailed explanation of the Figures at the end of the Appendix. In addition, the scale caption may be incorrect with the red colouring denoted as -1 for some figures and -2 for others.

I hope these comments are helpful; please let me know if further clarification is needed.

Yours sincerely,

  
Science Advisor  
English Heritage, South West  
29 Queen Square  
Bristol  
BS1 4ND  


## Exe Estuary Strategy Consultation Report

**122**

Dear Martin Davies,

Visiting Darts Farm earlier today my attention was drawn to the proposal to create more habitat for wading birds on the river Exe.

What a great idea which I whole heartedly support.

Sadly the preservation of farmland no longer guarantees its future for that purpose.

The proposal is welcome.

Good luck and best wishes,

**123**

Dear Martin

I am writing to you about the plans concerning the Lower Clyst Project which has been developed by the EA and the RSPB, to allow inundation of the flatland area of the Clyst Valley on high tides to encourage and enhance the habitat life of birds and other animals within this land section.

We already have a well-established bird reserve at Bowling Green Marshes and further alongside the shores of the estuary which is evident for all to enjoy.

We all want to see wildlife in our areas but at what cost to humans?

My concerns are that the road which is vital to transport people from East Devon to Exeter and vice versa, which crosses the Topsham Flats from the Bridge Inn to the George and Dragon passing adjacent to Darts Farm, and is therefore a vital infrastructure which if removed at certain times of the year when flooding occurred would cause havoc to local industry, retailers, school children and the general public who frequent this vital link road. It would not be a green solution either since people would have to travel further to get around this flooded road.

We have already seen many shops come and go in Topsham and to prevent a route into Topsham by flooding the road is ridiculous as it will kill retailing in the town.

If you build a new road 'high enough' to avoid flooding who will pay for it and its upkeep? Flooding might undermine the new road! Devon County Council is already trying to keep its bills low as otherwise we pay more council tax, and from what Cllr. Andrew Leadbetter said on BBC Radio Devon he is not in favour of this project or the costs incurred to build a new road.

If the current or new road floods then the public will be spending much more time and money sitting in traffic jams on Sandygate roundabout or Clyst St Mary roundabout, to enable their travel to continue. These extra miles are not going to be greener but involve more fuel costs and congestion.

I don't like to see bird habitats enhanced at a cost of increasing fuel consumption and harmful congestion.

Your plan does not work in the real world when people's needs are paramount.

Currently I enjoy looking at the animals grazing on land which is adjacent to the river Clyst as they have probably been doing for centuries. My glimpse at their current habitat is to enjoy this scene and the green fields around this area. The land may not be the best agricultural land but it is beautiful and giving grazing to cattle that would otherwise be placed somewhere else. We are currently undergoing a rethink on our food and how we produce our food after the 'horsemeat' scare. Why flood agricultural land for the sake of birds. They are not in our food chain and your plan would forsake cattle grazing which are in our food chain for a bird sanctuary. This is not common sense and will probably not be in keeping with EU agricultural policy for the future.

Land like this should be sought to produce more local food for places like Darts, Tesco and Sainsbury's and other local shops rather than be provided to sancta birds.

It is concerning that six years ago it was stated by EA that this project would not happen if the landowners didn't want it but this seems to be superseded by your unique group of operatives who have managed this scheme as it has now reached consultation stages.

I agree with the Clyst landowners and Bridge Inn objection to the Lower Clyst Project, and look forward to seeing and hearing your responses to their detailed criticisms and questions.

I am also informing MEP Graham Watson about this matter as EU policy changes when serious matters arise which threaten the habitats of people. I will be asking his team to look into this matter immediately and report back. I hope to have answers for you soon.

Thanking you for your time in reading my responses

Yours sincerely

**124**

Dear Mr Davis,

I have been involved in farming on the Clyst before you were born and I hope my grandchildren will still be farming on the Clyst long after this current obsession of the EA with managed realignment. In my lifetime there has been much talk about sea-level rise but feeding the population has already been a more important priority after the last war, and with population growth likely to hit 9 billion by 2050 this land may well be needed again. The Clyst should be considered a historically important piece of land, as it was originally reclaimed into a freshwater habitat and productive agricultural land by prisoners of war. And has since blossomed, with its diverse mix of wildlife which compliments the saltwater environment of the Exe estuary. It would be wise to wait and see whether sea level rise or population growth is a larger priority in 50 years (feeding the population or feeding the birds).

Please consider this Email as a strong objection to your proposals.

Kind Regards,

██████████

**125**

Response from Exmouth Town Council

*Extracts from completed questionnaire:*

(2) 'The amenity of access across Pole Sands needs to be taken into account, within the beach recharge proposals for Dawlish and Exmouth beaches. This route is vital to Stuart Line Cruises, fishing vessels and leisure craft. At the moment, fin-keeled vessels are particularly suffering, but it is dangerous for vessels to attempt to get across the sands 2 hours either side of low tide and the channel is also narrowing. As the beach recharge scheme requires dredging in the vicinity of the channel, it is vital that the dredging is used as an opportunity to open this channel.

In addition, flood risk to the lower Exmouth area ("The Colonies") is exacerbated by siltation around the outfall for the Hartop Road pumping station, which is already vulnerable to blockage as the estuary in the duck pond area has silted up to form a 'ditch' at the outfall, which catches debris and contributed to household flooding issues in 2012. The silting up is also a serious risk to water skiers in their designated area. Should this area be "skimmed" back?

(4) Exmouth Town Council SUPPORTS the recommendation for protecting the Maer, Exmouth.

Exmouth Town Council SUPPORTS the recommendation for improvements to revetments and raising walls around Camperdown Terrace and the Imperial Recreation Ground, Exmouth.

Notwithstanding our support, Exmouth Town Council remains concerned about the issues in 2 above.

(5) Countess Wear pumping station may be potentially responsible for pollution issues the whole length of the estuary and poor bathing water quality on Exmouth beach, given the number of discharges from that site in 2012.

Any flood-risk works that put more water into the land drainage system that feeds into that pumping station would exacerbate this problem.

Not only could this spell economic disaster for Exmouth, but the pollution would have a very detrimental impact on the sensitive biodiversity of the Exe. EA officer Brian Grant can brief on the causes of discharges.'

**126**

*Extracts from hand written questionnaire:*

(3) No firm Commitments made to protect C527 road or business in area. Where is financial provision?

(4) Until firm commitments are made the Strategy is flawed. Alternative solutions are available.

(6) It has no depth & is not engineer'd enough.

**127**

*Extracts from hand written questionnaire:*

(3) Almost no communication has taken place with landowners and occupiers

(5) Proper consultation with stakeholders in the affected area

(6) Does not take business considerations properly into account.

**128**

*Extracts from hand written questionnaire:*

(3) You have not considered local population

(5) As life members of RSPB we think (my wife and myself) that you are going too far to put bird life over the lives of people.

(6) Developers and planning officials appear to want to build on flood plains, putting people's lives at risk and increasing costs to the environment.

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129

Dear Martin

I sent the response below to you and Jane Lavick on Monday.

Unfortunately I have just received a 'could not send' message and I now realise I mis-typed your e-mail address.

I shall be glad if you will confirm that you have now received this submission and that it will be accepted as being within the allotted time.

Thanks

Managing flood and coastal erosion risk for the Exe Estuary  
Draft Strategy Consultation Document January 2013

We write in response to the above with a joint response on behalf of Topsham Society and Topsham Community Association. We would like to record our appreciation for the helpful and informative presentation you gave on 14 February at Mathews Hall, Topsham.

We agree with the opening premise in the draft Strategy that the Exe Estuary is 'special' and that the interests of a range of groups need to be protected through the development of a long term strategy. We also wish to stress a point made at the meeting, that whilst tidal flood risk is important, so also is the need for protection from floods arising from drainage systems and rivers.

We note that the draft says that recommendations will only go ahead if sufficient funding can be found, but we believe that it is vital that the necessary projects are implemented in the relevant time frame. This is especially important where the work is needed to safeguard residential properties and therefore our preference (see page 9) is that local partnerships are encouraged to seek contributions to help unlock national funding and increase project priority.

With regard to specific proposals within the strategy document the following points are important for us:

- The protection of properties along the Strand and adjacent to the recreation ground is a matter of high priority.
- The C527 road between Topsham and Clyst St George is an important local highway link and we give high priority to the need to protect and keep this road open for all traffic.
- The proposals relating to the River Clyst aroused a lot of local interest, in particular the plan to breach the existing river embankment to create a new intertidal wildlife habitat area gave rise to some strong objections. We were pleased to hear your assurance that this work would not go ahead without the agreement of local landowners.
- We are concerned that the likely additional tidal flow may create a need for enhanced protection to both the road and railway bridge over the River Clyst. We expect your Agency to work in close collaboration with the relevant Rail and Highway Authorities to monitor this situation and to bring forward remedial measures as necessary.
- The Strategy refers to the need to raise the canal banks in the longer term, but following recently observed damage, we recommend that the banks are re-surveyed in the near future to ensure that they remain in good condition.
- Future changes to the Dawlish Warren sand spit are assessed as likely to have a minimal impact upon Topsham – we request that you carry out more detailed modelling to give us greater confidence in this prediction.
- 

On behalf of both Topsham Society and Topsham Community Association we welcome the development of a long term plan for the future of the Exe Estuary and we trust that our comments will help you to shape the final version of the Strategy.

Yours etc.

[Redacted] (on behalf of Topsham Community Association)

[Redacted] (on behalf of The Topsham Society)

**130**

**Received after 04.03.13**

Dear Mr Davies

I have picked up a flyer from Dart's Farm urging me to object to plans for work between Darts Farm and Bridge Inn relating to Flood protection.

I have looked at your website and spoken to people at Darts, but am still unclear as to the proposals.

As I understand it the main cost element arises from raising the level of the road between Darts and Topsham and this is in the region of £80,000,000.

Firstly, is this correct?

If so, what is the thinking behind it?

If it is to stop the road from being intermittently flooded, I do think by itself this is a high price for perhaps 2 or 3 days inconvenience a year. Incidentally I live at Lypstone so am directly aware of the problem.

There is also talk of it providing a wetland for migrating birds.

I am unsure which is the primary motive for the work and in either case it is committing a large amount of money, which could well be spent more usefully elsewhere.

What I haven't considered, though, is the possibility that raising the road and providing a flood pond upstream, might provide flood protection for properties down stream on the Clyst/Exe. If this is so, it could colour my decision as to whether to object or not, but I will need further information and would be very grateful if you could kindly arrange for someone to let me have it.

I am unsure how long I have to let you know my views on this proposal, but I would be grateful if you could please clarify the above points in good time to respond.

Kind regards and thank you.

**131**

**Received after 04.03.13**

Please find attached a copy of the SW NFU response to the consultation on "Managing flood and coastal erosion risk for the Exe Estuary".

If you have any questions then please contact me.

Thank you

SW Environment Adviser  
NFU in the South West  
Agriculture House  
Pynes Hill, Rydon Lane  
Exeter, Devon, EX2 5ST

### **Consultation Response**

**Date: 7th March 2013**

#### **SW NFU Response to the Managing flood and coastal erosion risk for the Exe Estuary**

The South West NFU welcomes the opportunity to comment on the draft version of the Managing flood and coastal erosion risk for the Exe Estuary. The South West NFU represents approximately 10,000 Farmers and Growers across the region. Farmers have and wish to continue to be involved in the development of the strategy. It is essential that their views are built in to the final plan due to the economic, social and environmental importance of the agricultural sector in the area.

Having reviewed the strategy, it is clear that there are implications with regard to agriculture and land management in a number of areas. For this reason we feel our input would be of most use if submitted in the form of an overall response for the whole area.

#### **Overall comments**

The NFU and its members recognise the importance of strategic planning with regard to managing flood and coastal erosion and that taking a long term view is essential given the timeframes within which coastal

## Exe Estuary Strategy Consultation Report

processes occur and the potential impact of Climate Change. We also feel that a long-term plan will help to ensure coordination between different but contiguous plans including Catchment Flood Management Plans. Our main concerns are:

1. Climate change and food supply are global phenomena. Food production must at least double by 2050 while climate change will curtail production in many parts of the world. The South coast must prepare for increased reliance on locally sourced food and energy.
2. Landowners and tenants that are to be affected by any changes in management or potential loss of land due to policy decisions MUST be consulted and listened to. Landowners have an understanding of the recent history of the land and also close links with the community. The views of landowners should not be dismissed as “anecdotal” and should be regarded as “non-scientific local experts”. Therefore, they can help to frame solutions for all.
3. Where land is lost then landowners must be compensated in a way that both reflects the current value of the land but also the profit foregone into the future due to the loss of land. Valuation under the multi coloured manual (MCM) as used by the Treasury does not adequately reflect the value of land within the context of the whole farm. Therefore, any payments must recognise this deficiency and seek to meet the full value of the land and asset.
4. Within the strategy are 25% of the land is graded as Grade 1 and this represents our best and most versatile soil. To put this into perspective only 1.7% of land within Devon is of this quality and the majority, 93%, is of grade 3 or below. This land is irreplaceable and valuable for food production.
5. The figure given for land values within the Baseline Risk Assessment is not referenced and does not represent current agricultural land prices.
6. Farmers who are forced to move will need to find land of a similar quality which is exceptionally limited and will be far above the prices quoted.
7. The strategy recognises and discusses landowners but consideration must also be given to tenants. In many cases their businesses will be dependent on tenanted land in the area and will not be able to find a suitable alternative and will not be compensated as a result of the change of use of the land.

In addition to our main concerns there are a number of key issues for farming and land management:

- The strategy must be sufficiently flexible to allow individual land managers to manage their land and assets irrespective of broad-brush policies.
- There must be a streamlined and efficient authorisation process to enable land managers to maintain their own seawalls when necessary and where they wish to do this.
- There must be a mechanism to facilitate long term co-operation among land managers to find local solutions to local issues.
- Managed retreat and habitat creation projects should only be approved when they are justified in terms of flood risk management as well as environmental enhancement.
- Whenever possible coastal land should be managed by riparian owners, not institutions.
- The tax regime should be revised to aid the use of ‘inert waste materials’ in seawall construction and maintenance
- The UK interpretation of the EU Habitats Directive should be reviewed so that practical solutions can be delivered (where imposition of the regulations might thwart progress)
- Longer-term payments for habitat creation under Higher Level Environmental Stewardship (HLS) should be available in cases of permanent land use change. HLS is only a 10 year scheme and is therefore inadequate where the impact of an action is in perpetuity.
- The cultural and historical importance of man’s (farmers) management of the coast over many centuries should be recognised

## Conclusion

The NFU recognises the need for long term strategic management of flood and coastal areas. In addition the NFU recognises the need to balance economic need and environmental enhancement with the deployment of the resources available. The main concerns have been noted above and key to the success or not of the strategy is the full and open engagement with farmers and landowners. These landowners should be able to exercise their right to peacefully enjoy their land should they wish to and where possible should be supported by government and the public to do this. Where they are willing to change the use of the land then they must be compensated for the true value of the land, not the MCM.

**132**

**Received after 04.03.13**

Sir

A family member happened to pick up a leaflet at Darts Farm on a proposal to increase bird habitat by allowing acres for wading birds by allowing farmland to flood with seawater. I am concerned about this principal but as a farmer living in Clyst Hydon I am concerned that the exit of water that passes over our Farm will be obstructed and cause increase flooding and land to become saturated.

I would like your assurance that this perverse plan will also consul with the many other potentially effected business up stream of the Exe Estuary?

I look forward to your reply

**133**

**Received after 04.03.13**

Dear Martin,

Although I live in Bristol, I was brought up in Exeter and continue to sail from Topsham where I have a small flat.

I have seen the highly organised lobbying associated with Dart's Farm. And I thought that the issues merited more study. I see that you have made a lot of information available on the EA website. And of course there is vast amount in the public domain about environmental change generally.

My conclusions are that the issues are somewhat bigger than the particular interests of farming on reclaimed land in the Clyst valley. It is unfortunate though that developments for the benefit of us all will disadvantage some particular individuals and families. They should certainly be compensated. But they should also be opposed if they seek to prevent steps which become necessary to preserve diversity in the context of global warming and the rise in sea levels.

On the road, this must clearly be preserved because it is of material importance to local communities and to economic, social and cultural activity. I assume that a scare story is being generated to gather opposition to EA proposals, so the future of the road needs to be clarified quickly.

The Dart's Farm leaflet urges readers to email you if we 'oppose the destruction of this land'. I support the development of the land in new, environmentally constructive ways, as has been suggested.

It is the fate of a public body to have to maintain positions in the public interest even when facing sustained attack from vested interests. Good luck with it.

**134**

**Received after 04.03.13**

The flooding would be an environmental disaster and this consultation exercise needs to be weighed more in favour of having to justify the proposals, rather than asking for reasons not to progress. The Strategy does not deal with the risks. The Strategy does not adequately address all the issues.

**135**

**Received after 04.03.13**

The recent flooding and that of December was a result of unprecedented rainfall in the wettest winter on record not raising Sea levels. To flood the river Clyst valley would destroy good farming land and do nothing to prevent flooding, in fact may well make it worst. To do this to create more habitat for migrating birds when the entire Exe estury is adjacent makes no sense.

Please reconsider this plan.

## e-Consult Responses

We received 19 responses using our online e-consult site. These can be seen at <https://consult.environment-agency.gov.uk/portal/re/sw/flood/exe/strategy?tab=list>

Where the questions had an option to comment more fully, these responses are included below. This includes the following questions:

- (2) If you think that we have missed something please explain what:
- (3) Do you think we have adequately considered all the important issues?
- (4) If you do... do not support the strategy recommendations please explain why:
- (5) Do you have any further comments...?
- (6) Do you have any comments on the Environmental Report?

**Exe\_1** [REDACTED]

(2) As a graduate with a degree in physical geography and geology I cannot agree that a policy of replacing squeezed habitats can realistically or economically be achieved for the UK and in particular for the south coast of Devon and Cornwall. Existing intertidal zones have been created by deposition over thousands of years. Trying to artificially replace such environments is not practicable and will incur unreasonable expense. This is acknowledged by the RSPB on page 25 of "seas of change" published by the RSPB in 2002. Suggesting areas such as the Clyst valley should be flooded will result in unacceptable cost.

**Exe\_2** [REDACTED]

(2) It is difficult to answer the question above as there isn't the level of detail to know whether these risks are adequately addressed by this draft strategy.

(5) In respect of Lympstone the document says the tidal walls will be increased in response to more flood risk from the estuary, however this cannot be done in isolation as the tidal impact is felt much further into the village than just the river frontage. Please can you ensure the strategy includes the tidal impact up through the Wotton Brook, particularly in the culverted section from the harbour to Chapel Road and the open section right up through into the car park. During autumn and winter 2012 the combination of fluvial and tidal impacts caused flooding through this area, almost into properties including along Underhill.

**Exe\_3** [REDACTED]

(5) Following discussion at a recent meeting, Kenton Parish Council wishes to register its interest as a Parish Council in being involved in future discussions in respect of the issues of flooding in the parish and compensatory plans relating to habitat loss.

**Exe\_4** [REDACTED]

(2) I think, and I never thought I would say it, you have satisfied my concerns on all fronts. The fact that the money has become available brings reality to the strategy and I for one can't wait to see it started.

(5) The sooner you can start the better! This will be good for the area. What happens after 50 years if nothing is done? No-one really knows as nature moves in mysterious ways. What will happen in 50 years after you have built the embankment / tidal inlet? No-one knows but at least the Warren community will be protected from flooding and we should have a beach of some sort. There will be tremendous upheaval during the works which will be an attraction themselves. People like to know what is going on so regular updates online / onsite are needed. Disruption during the "season" when most visitors are here should be kept to a minimum. Promotion that it is "Business as usual at Dawlish Warren" needs to be made clear everywhere.

**Exe\_5** [REDACTED] **Woodland Trust CONSULTEE**

(2) Whilst we appreciate that tree planting for water flow benefits may be more applicable to upstream riverine situations, we would nevertheless like to flag up the role that targeted woodland creation could play in the Exe Estuary for both coastal flood water control and habitat mitigation for other habitat lost to sea rise. In addition, often estuarine flood risk can be exacerbated when it coincides with high downward fresh water flood flow, and woodland creation can play a role here too.

As well as potentially contributing to flood flow holding barrier needs, woodland can also stabilise soils through root penetration and provide permeable surfaces in built environments for enhanced water soakaway. Research by the University of Manchester has shown that increasing tree cover in urban areas by 10% reduces surface water run-off by almost 6%.

In conclusion, the Woodland Trust believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues. They offer opportunities to make positive water use change whilst also simultaneously contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication Woodland actions for biodiversity and their role in water management (pdf)

**Exe\_6** [REDACTED]

(5) We see this as an opportunity to put Dawlish Warren back on the map and would like to make sure that those interested in the scheme will be able to have access to information both onsite and on a website. We understand that the bulk of the work will be carried out in the winter months and would like reassurance that the beach will be left in a usable and safe state during the main tourist season (Easter to End Sept). It is very important that businesses on the Warren are kept up to date with progress and when access to any part of the beach maybe restricted. We do hope that any disruption will be kept to a minimum but appreciate the works need to be carried out.

## Exe Estuary Strategy Consultation Report

We have a very busy website which is used by visitors and local people alike to access information and the webcam on a regular basis. This maybe one avenue which you could use to inform of the works being carried out. We could also offer to organise a second webcam as a joint venture pointing towards the works as it is carried out. Our current webcam image can be seen on the website [www.dawlishwarren.info/webcam/](http://www.dawlishwarren.info/webcam/) We look forward to working with the Environment Agency and any other organisations to help keep the public informed.

### Exe\_7

(5) Hopefully the beach will be unaffected in the main tourist season during the scheme. The scheme looks great - looking forward to seeing the works that have been proposed, begin. Noticeboards on approach to Dawlish Warren (tunnel) and in car Parks would be a great way of letting visitors and locals know how the works are proceeding and next steps.

### Exe\_8

- (2) why ruin productive farmland and a beautiful landscape, surrounding Darts farm, and removing the road to east devon from topsham is ludicrous it a key transport link for people and should be protected.
- (3) Bias towards the enviroment at the expense of the local economy, farming, businesses, transport via roads causing increased conjection elsewhere.
- (4) I agree with the rest of the stragty but not the part at Darts farm, protecting the train line and main road too dawlish from exeter is vital,
- (5) cockwood harbour should be tastefully improved in terms of road and harbour walls not a concrete monstrosity replacing/repointing the stone thay already exists as it adds great caracter value to the area, as its the harbor that makes the villiage I had the fortune to be born into and growing up. it brings in the toursts for which a two pubs and a campsite are dependent on.

### Exe\_9

- (2) It is of primary importance to preserve the present position as a minimum to protect businesses, the leisure industry and the environment.  
It is particularly important to retain the spit at Dawlish Warren as a defence and environmental gem. If there is a minor loss to marine life ot the current eco system then it should be accepted for teh greater good.
- (3) I am not a specialist and do not know all the ramifications and possibilities thus I do not know if all teh important issues have been covered.
- (5) Improving the quality of teh beaches for tourism would be great.
- (6) The recycling of materials in the bastions at Dawlish Warren has been raised.  
It would seem sensible if the sea defences to the railway between Dawlish Warren and Dawlish could be improved by using teh stome from the bastians to build up the lower level of the footpath on teh sea wall up to the higher level. That would have the added benefit of improving the important coastal path and safety.

### Exe\_10

- (5) It seems to me that the proposal is reasonable insofar as it allows a managed response to be put in place as an alternative to random natural events, which would be better for roads, properties and wildlife potential. It also seems to me that it would only go ahead with the agreement of landowners, who could gain income from schemes designed to make payments for environmental benefit  
So a choice, which seems ok
- (6) See above - I would only add that anything that can be achieved that helps nature isnt a bad thing and there is plenty of pressure on the estuary

### Exe\_11

- (3) I have not fully read the report yet, I was too angry. I shall read it more fully later
- (4) You describe the land between Clyst and Topsham as non productive. You ignore the successful farming on this stretch, and the costs of diverting traffic from this road or of diverting or elevating it.

### Exe\_12

#### See also general comment 59

- (2) The EA consultation on managing flood and costal erosion risk around the Exe Estuary focuses on habitat and sea level rise. As sea level rises, the low water level will rise, though the high water level cannot rise due to the train line, therefore mud (habitat) will be lost. We understand that EU habitat directive (law) states that any mud (habitat) lost must be replaced even if there is already an oversupply of mud (habitat) and birds have more than sufficient/surplus feeding grounds. We therefore find ourselves potentially destroying good fertile agricultural land and putting people, property and essential infrastructure at greater risk in order to comply with an EEC directive regarding birds and bird habitat in the River Exe SPA.

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The EA is no longer maintaining some of the banks along the Clyst, allowing the land to sit wet, reducing water storage capacity and increasing flood risk. The EA say it is only agricultural land and not their responsibility. We say the river is an interlinked ecosystem and the scheme would increase flood risk for property and infrastructure. For this reason, we object to the current policy of non-protection of agricultural land and the proposal to allow increased intertidal activity by removing riverbanks.

The consultation taking place deals with habitat and sea level rise and does not consider fluvial events and activity. The biggest factor currently affecting flood risk on the Clyst is fluvial activity. Therefore until it is fully understood how fluvial activity impacts it is impossible and not appropriate to be considering this strategy.

The group's concerns are based on the following points:

### **Requirement for Ecological Changes**

The proposals have potential to have very considerable impacts on the land, adjacent businesses, and community for many, many years to come. We fundamentally question the requirement for the creation of additional areas of intertidal habitat on the Exe and particularly given the consequences, require the EA to be very conservative and very, very sure of its requirement.

In particular, the River Exe main channel was dredged for many years. Now that dredging has ended the profile of the channel has changed increasing the surface area of the intertidal habitat. Natural silting associated with sea level rise over the next 100 years will also increase this intertidal area. We presume this has been looked at and request the surface area changes from digitizing to be provided.

### **Alternative Areas of Mitigation**

The land between Turf and Powderham on the east bank of the Exe Estuary would potential provide a better site for mitigation than the Lower Clyst - it should come ahead of the Lower Clyst with regard to "Proximity" and also is lower lying and already in areas saline. This area was saline in the past and the estuarine alluvium would better support restoration. Please provide the technical assessment details for this area and confirm why this site has not been progressed.

### **Damage to Farmland - Precautionary Principle Must Apply**

Dredging of Channels in elevated mud banks within the Exe Estuary. Dredging of additional channels within the high mud banks of the central Exe Estuary would provide a greater lower intertidal surface area used for feeding. Please confirm whether this has been considered and provide technical arguments for and against. For instance following the war many similar areas were drained to increase food production and who knows within a relatively few number of years political forces may change back again!

We will need to be very sure of the impact of such radical proposals before progressing.

### **Existing Flooding Problems Ignored**

Any proposals for habitat creation must be considered following a detailed hydrological review and action plan to deal with the severe flooding problems of the Lower Clyst. The flooding had a considerable financial impact on businesses and the local community and must be addressed as a matter of urgency.

It may be possible to prepare proposals for ecological change alongside flood mitigation proposals but the appraisal document does not indicate that this has been done.

We understand that accepted good practice for Sustainable Urban Drainage and Catchment management requires that drainage at the lower ends of catchments should be drained as rapidly as possible and water high in the catchment held back (particularly the case in fast reacting catchments such as the Clyst). The proposals appear to counter this basic flood management approach. Presumably drainage schemes for projects such as Cranbrook have assumed this approach - Detailed explanation is required as to how these proposals follow this sensible approach.

(3) We require the following specific technical information to be able to consider the strategy:

1. Please provide mapping of future habitat loss.
2. Please explain why you wish to replace lost habitat (mud) with fertile grassland. Should you be looking to replace like with like same type of lost habitat?
3. There has been an increase in mud over the last 25 years since dredging the River Exe was stopped, causing the river to silt up.

The creation of Goosemoor has also increased habitat (mud). It should be noted that Goosemoor is not being used much by birds as a high tide roosting location, suggesting there is no need for additional habitat.

4. Please provide information which considers the data on the increase in mud.
5. If additional habitat (mud) is required then why not dredge new channels in the Exe, increasing the valuable margins at low water level?
6. Powderham Wall would potentially provide a better site for habitat mitigation than the lower Clyst. Please explain why this location has not been included in the consultation.

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- 6 a. Has this location been sequentially tested against the Clyst for the most appropriate site?
7. If there are no suitable areas for appropriate habitat gain in the River Exe or Clyst, what other alternatives are there?
8. When will the fluvial activity study and consultation take place?
- Until the fluvial activity study and consultation has taken place, it is inappropriate to make any decisions regarding the current consultation.
- The EA should continue to manage and maintain all riverbanks on the River Clyst. Please provide us with the modeling data that disproves that the river acts as an ecosystem and the banks protecting agricultural land reduce the flood risk to property and essential infrastructure to the local economy.
- The river channel should be dredged to allow the marshes at Clyst St. Mary to drain properly. Currently, as this land is sitting waterlogged, there is reduced flood storage capacity and therefore higher risk of flooding.
9. What rainfall data figures did engineers use when designing Cranbrook?
- 9 a. Have the most recent higher figures been tested in the modeling to check robustness?
10. Agricultural land has become completely unproductive in the Clyst near Clyst St. Mary because it is permanently waterlogged. Has food security, population growth and potential future policy change been considered and taken into account in current strategy?
11. What compensation or financial incentives are being offered to farmers?
12. Is there a guarantee of funding for the raising of the Topsham road or building of a new protective road barrier?
13. What data has been used to assess water volumes that would eventually pass under the Clyst bridge at Topsham if a new bank/barrier was built? Please provide data.
14. What impact would this scheme have on Fishers Mill? Please provide data.
15. If the road was raised, how many culverts would pass under it and in what locations, and where would the new channels be located? Please provide data.
- 15 a. What would the maximum eventual water flow volume be?
16. How will the Avocet railway line be protected?
- 16 a. Who will pay for it?
17. Have raised ground water levels been taken into account in the modeling work done to predict flood risk?
- 17 a. Has a sensitivity analysis been applied, taking into account global warming and the chance of higher rainfall levels?

(4) All landowners listed below are opposed to the strategy recommendations as the consultation does not consider fluvial events and activity - the biggest factor affecting flood risk on the Clyst. Therefore, until it is fully understood how fluvial activity impacts, it is impossible and not appropriate to be considering this strategy.

This is a group of land owners whose land makes up the Lower Clyst Valley. The list of landowners include: Michael Dart, James Dart, Paul Dart, Mark Tremlett, Caroline Cheffers-Heard, Nigel Cheffers-Heard, Judy Langdon, Drew Langdon, Mike Trout, Ed Fisher, Robin Giles, Rosemary Northmoor, Don Freemantle, Paul Bragg, Bob Peachy, Mrs Zeal, Tom Broom, Lynn Trout, Geoff Bowen and Jimmy Walsh

### Exe\_13

(5) I believe it is a balance between protecting property, communication routes and enhancing the environment by using it as a tool to attempt to reduce the impact of flooding, both from land and sea.

### Exe\_14

(4) While I generally support your policies on the Exe Estuary I would like to highlight 2 aspects. I wholeheartedly support your proposed managed realignment policy on the Clyst. Opportunities for recreating precious intertidal habitats are few and this could be a very positive project for our estuarine wildlife resource, bring additional tourism into the area, as well as a lot of pleasure to local residents of the area like myself.

On the other hand I don't agree with your policy of beach recharge and maintenance of the coastal defences at Dawlish Warren in their current state. Whilst there are a couple of businesses that are likely to be impacted if there was a policy of no active intervention, these businesses are still at risk with increasing extreme weather events even if the defences are maintained. I understand you believe the Warren protects the rest of the estuary from wave action and that it could disappear. But given historical paintings of the area it seems as though the Warren existed in one form or another for a long time before it was defended. The current management regime is creating artificial and impoverished habitats and inhibiting the natural movement and progression of the sand dune resource within the SAC... doesn't this contravene the Habitats Directive?

(5) I don't agree with your policy of beach recharge and maintenance of the coastal defences at Dawlish Warren in their current state. Whilst there are a couple of businesses that are likely to be impacted if there was a policy of no active intervention, these businesses are still at risk with increasing extreme weather events even if the defences are maintained. I understand you believe the Warren protects the rest of the

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### Exe\_15 ( [REDACTED] [REDACTED] )

- (2) As you the agency do not manage the water ways the way they should be, (your answer is to flood) it is flooded many times a year due to poor maintainance. There is no need or scientific evidence that suggests the flooding. The habitat and wading birds have done well for hundreds of years without flooding. This Country needs good productive farm land to supply good home produce, We all like to watch the birds on the river EXE.
- (3) We need good unflooded farmland.
- (4) We need good unflooded farmland
- (5) We do not need do gooders
- (6) Report by some middle class idiot

### Exe\_16 ( [REDACTED] ) **Exminster PC Councillor Caroline Aird** **CONSULTEE)**

- (4) We agree that there is concern regarding surface water which presents a flood risk to properties in Exminster and we strongly support the recommendation that further detailed studies are done on the impact of climate change to properties at the south end of the village.  
We do not think that surface water is the only concern. Over this winter water table levels have been very high but when combined with high tides some Exminster residents have been concerned for their properties.

### Exe\_17 ( [REDACTED] [REDACTED] )

- (3) These documents are difficult to follow, there is not much 'plain english'.
- (4) I am concerned about the effect on the transport routes, local business and homes. I am concerned about the effects on the woodland adjacent to the river.

### Exe\_18 ( [REDACTED] [REDACTED] )

- (5) As a local business we would like to be kept fully informed of the progress of any work being carried out at Dawlish Warren Beach that would affect public access as we would like to keep our customers informed.
- (6) We understand that the works needs doing as currently the sand is fast dissappearing. We are looking forward to being able to promote Dawlish Warren as a 'Sandy Beach' again!

### Exe\_19 ( [REDACTED] [REDACTED] )

- (5) I do hope that you plan to keep the general public informed, the beach at Dawlish Warren is used all year around for walking by our family and it would be good to know when access is restriced.