Rt Hon Dr Thérèse Coffey MP
Secretary of State for Department for Environment, Food and Rural Affairs
2 Marsham Street
London SW1P 4DF

cc. Rt Hon Jeremy Hunt, Chancellor of the Exchequer
cc. Rt Hon Michael Gove, Secretary of State for Department of Levelling Up, Housing and Communities
cc. Alan Lovell, Environment Agency Chair
cc. John Curtin, Acting Environment Agency Chief Executive

17th May 2023

Dear Secretary of State,

Re. Thames Estuary 2100 Plan – Ten Year Review and Updated Plan

The Thames Estuary 2100 Plan (TE2100) aims to protect over 1.4 million people, £321 billion of property and £129bn of other transport, infrastructure and business assets. It plays a vital role in helping communities across London and the wider estuary adapt to the existing risk they face from tidal flooding, as well as managing the growing risks of flooding that climate change is bringing. The Plan takes a world-leading approach to adaptation planning, to assure the resilience of the UK’s economic powerhouse.

For the past two years the Environment Agency has been working with partners to understand the changes in the estuary in the last ten years, and to update our understanding of future climate change. The result is an updated Plan, based on the latest policy, data and climate evidence, to ensure London and the estuary can continue to thrive and grow.

I am writing to you in my capacity as Chair of the TE2100 Independent Advisory Group. The Advisory Group has acted as a critical friend to the Environment Agency to identify areas where changes could improve the long-term effectiveness of the Plan in supporting lives and livelihoods across the estuary. Beyond enhancing flood resilience, the benefits of the Plan are wide ranging – protecting and enhancing biodiversity and nature recovery as well as supporting a high-quality public realm
through increased use of public space and greater participation in cultural and recreational activities.

Whilst the Plan must be delivered in partnership with many other organisations including councils and businesses, the success of the Plan will also be dependent on the strategic leadership and support of Government. My Advisory Group is therefore making four key recommendations to you alongside the Environment Agency’s launch of the updated Plan on the 17th May 2023.

1. The Plan should be placed on a statutory footing in spatial planning

It is critical to ensure that the Plan’s requirements are embedded in local spatial planning frameworks and planning decisions about development applications, rather than relying solely on influence to achieve this as is currently the case. Placing the Plan on a statutory footing would have two important impacts:

- the safeguarding of land in the Thames Estuary for future flood defences, including a potential new Thames Barrier, would provide protection for London and the estuary as sea levels rise. Requiring planning authorities to have regard to the future defence raising options in the Plan would enable the Environment Agency and local authorities to identify and secure available land;
- strengthening the status of the Plan within local spatial planning would ensure that climate resilient visions for our riversides can be co-developed and implemented with developers, landowners, planners and communities, delivering cultural, environmental and commercial enhancements. The Plan is dependent on the development and embedding of riverside strategies by councils in local planning by 2030.

2. A long term funding solution is essential to ensure the sustainable implementation of the Plan

Climate adaptive planning requires continuous development and iteration to ensure solutions are cost-effective, risk-effective and environmentally sustainable, by making the right choices at the right time. Securing ongoing investment in the monitoring and implementation of the Plan is therefore vital.

Significant investment will be required in the near term to continue to maintain the current ageing flood defence assets which protect this nationally and economically significant geography. Alongside investment in flood protection, through hard defences and natural flood management, the Plan also requires greater investment in habitats and nature recovery so that the Thames Estuary can continue to create climate-resilient places for wildlife and people.

The scale of investment required will continue to grow from 2040 onwards as planning for significant defence raising and a decision on a future Thames Barrier option are required.
Defra, HMT and DLHUC should work with the Environment Agency and partners to identify the funding mechanisms we need to ensure we can maintain a flood and climate resilient estuary in the near term and future years. This work should be completed within the next 2 years.

3. A Government review of how best to maintain and fund 3rd party flood defences in the estuary to ensure a consistent and comprehensive approach which keeps pace with rising sea levels

The Environment Agency is only responsible for maintaining 12% of the complex network of defences in the Thames estuary, with other riparian owners (3rd parties who own the land next to the river) responsible for the other 88%. This presents a significant risk to maintaining the high standard of protection offered by the tidal defences. It also risks inconsistent standards being applied across defences.

If a flood defence is in a very poor condition, the current Tidal Thames Contributions Policy aims to ensure landowners maintain their frontages (or pay the Environment Agency to do so). However, it is difficult for the Environment Agency to enforce, leading to piecemeal maintenance of defences, significantly increasing the level of risk.

4. Local authorities and the Environment Agency need ongoing resources and support for the awareness and engagement that is essential to an adaptive planning approach

Defra and DLUHC need to consider how to support local authorities and the Environment Agency with the resources and skills to engage with affected communities to deliver the Plan. We are aware that in recent years public authorities have struggled to resource and recruit the skills they need to support communities with flood risk management and climate adaptation. We are concerned that this could undermine the efforts to put the Plan into practice.

We strongly endorse the ambition in the updated Plan for an ongoing programme of engagement, awareness-raising and education linked to climate change and flood risk.

Conclusion

We commend the completion of the updated Thames Estuary Plan and its ambitions not only for flood resilience but also the key role it will play in contributing to wider sustainability, net zero, nature recovery and public realm benefits.

We look forward to your response to our four recommendations in critical areas where we think the implementation of the Plan needs to be better supported by central Government.
We would be very happy to discuss this with you further.

With best wishes

Julia King, The Baroness Brown of Cambridge DBE FREng FRS FMed Sci
Chair of the Thames Estuary 2100 Plan Advisory Group

Members of the Thames Estuary 2100 Plan Advisory Group:

Andy Bord, Chief Executive at Flood Re
Kathryn Brown, Director of Climate Change and Evidence at The Wildlife Trusts
Peter Daw, Head of Climate Change at Greater London Authority
Dr Martin Hurst, Regional Flood and Coastal Committee Chair (on behalf of the
Southern, Thames and Anglian Eastern Regional Flood and Coastal Committees)
Samantha Kennedy, Director of Environment and Climate Action at Essex County
Council
Robin Mortimer, Chief Executive at Port of London Authority
Olivia Shears, Senior Analyst, Climate Change Committee