Response to Suffolk County Council Framlingham Flood Investigation Storm Babet 2023

Compiled by

Framlingham Flood Resilience and Recovery Working Group

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Framlingham Flood Resilience and Recovery Working Group

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Part 1 Response to the Suffolk County Council Section 19 Report

1 Introduction & Purpose

The Framlingham Flood Resilience and Recovery Working Group (FFRR) was established after Storm Babet on 20th October 2023 to review and make recommendations about:

(a) enhancing the resilience of our town to future flood events

(b) to update and test our emergency response capabilities after experiencing a COVID pandemic and flooding over the past three years.

This document is our detailed response to the Suffolk County Council (SCC) report: 'Section 19 Flood and Water Management Act 2010 Framlingham Flood Investigation – Storm Babet 2023'.

The FFRR understands that SCC is willing to consider altering its report and recommendations in the light of the local knowledge and concerns collected here by the FFRR. **This is important because SCC's 'Section 19' report will be critical to identify and set the levels of funding available** to make towns such as Framlingham more resilient to natural events, such as flooding in the future.

This document also consolidates the evidence generated by extensive local flood reporting and wide public comment and inputs, putting it all into one place in Part 2. This compiles all relevant flood information to date, allowing decision makers, such as the FFRR, SCC, and Environment Agency, and our residents and local businesses to review the evidence and to comment on next steps / decisions to be taken.

1.1 Reaction to the Flooding - Acknowledgements

The FFRR Group sends a note of thanks to Suffolk County Council (SCC) and the team / authors for its efforts in compiling this document.

The group would like to state that in this review potential areas for improvement have been noted and we hope that these are viewed in the spirit of constructive proposals.

We would also like to thank the very many town residents who have willingly given up much time, expertise and personal effort to meet, discuss, research and find answers to 'future proof' and enhance the resilience of our town to future emergency events.

The community and Council response to Storm Babet and the severe flooding in Framlingham, supported by local charities, was magnificent. It represented the very best of what our town is capable of when we work together.

See the web page for Framlingham Flood Resilience and Recovery Working Group https://www.framlingham.com/resilience-group

2 Feedback on the Suffolk County Council Section 19 Report: Storm Babet - Framlingham

On 25th July 2024 Suffolk County Council (SCC) issued the first of 50 statutory 'Section 19' reports required for our district, covering the Storm Babet Flooding event in Framlingham [4], given it was perhaps the most severely impacted parish..

The report's scope is outlined on this page on SCC's web site:
https://www.suffolk.gov.uk/council-and-democracy/council-news/major-flood-investigation-report-published-as-suffolk-continues-response-to-storm-babet

A link to the report itself can be found below:
https://www.suffolk.gov.uk/asset-library/framlingham-flood-investigation-report-24-07-2024.pdf

The two most significant concerns of the FFRR are given first below, followed by detailed section by section review comments.

2.1 Gaps Compared to Existing Available Work

Immediately after Storm Babet on 20th October 2023 Framlingham Town Council, working through the FFRR, agreed to hire a consultant (approved by Suffolk County Council) to review & report on Storm Babet flooding as response to the urgent need for accurate information on causes and effects.

The comprehensive Amazi Flooding Report [3] (Appendix C.), completed in April 2024, was a first in the county. Its scope was

> "to be a tool for use to expedite discussions with relevant parties. This review does not intend to replicate the work of SCC or the Environment Agency (EA), who have the benefit of County wide information and associated resources. It is intended to sit alongside the work of the other authorities."

The official Section 19 report on Storm Babet in Framlingham by SCC (as Lead Local Flood Authority or LLFA) would normally have taken some time to produce, however it was prioritised as so many properties were affected, and was produced much earlier than expected on 25th July 2024.

Both the Section 19 and the Amazi reports have nearly identical scope, and both give lists of recommended actions. However, the relation between the two lists is unclear. Some recommendations are similar in both reports, but many of the Amazi recommendations do not have a parallel in the Section 19 report, while the Section 19 report adds a few with no parallel in the Amazi report.

Framlingham Town Council (FTC), through the FFRR, has been working through the relevant actions recommended in the Amazi report. We had hoped that the official Section 19 report would build on the Amazi report, adopting most recommendations, perhaps deprecating a few, and adding others where there were gaps.

Instead, the FFRR notes that the Section 19 report hardly mentions the comprehensive Amazi report (although completed 3 months earlier in April 2024), simply referring to it in the list of actions, as a completed action point. We had expected to see analysis and discussion comparing the two reports and giving rationale about any differences between

the actions that need to be taken, in order to both protect and make our town more resilient to these events in future.

Appendix K. gives the result of our attempt to reconcile the two lists of actions. In general, the Amazi report is stronger on strategic recommendations and fills gaps in the Section 19 report such as sustaining a maintenance programme long-term, changes to the development planning process and more ambitious flood prevention measures, which are all discussed in the following subsections.

2.1.1 Sustaining Maintenance for the Long Term

In general, the SCC report records more immediate watercourse maintenance tasks well, like clearing debris. But it lists them as one-off actions, and disappointingly fails to ask why the regular maintenance programme wasn't followed and how it needs to be corrected. In contrast, the Amazi report only notes one specific maintenance task. But, it focuses more on ensuring that maintenance will be sustained for the long-term.

The next version of the Section 19 report could take the best from both reports, by adopting the following recommendations from Amazi that establish processes to deal with short-term issues but also sustain over the long-term:

- "*Consider creating a local river management team to identify areas for action in a coordinated manner and with recognition from the Environment Agency. So more coherent voice: walk route, training, voluntary, safety.*
- *Clear plan for assistance with dredgings /debris disposal: funding and organising skips to remove items rather than leaving on the banks to act as debris during a flood. clearance away from [...]*"

2.1.2 Recommendations Concerning Development Planning

Development planning is not mentioned in the Section 19 report. The FFRR asks SCC to consider adopting the following two recommendations from the Amazi report:

- *C10: Development planning to fully consider the extent of flooding that occurred during Babet which was more extensive than flood extent estimates currently used in planning process (i.e. that currently identified in the Environment Agency flood model).*
- *C12: Ensure developments appropriately consider no increase in flood risk elsewhere:*
  - *a) flood storage and*
  - *b) exceedance run-off*

  There are examples of developments in Framlingham that have not complied …
  (see Amazi report for full text of recommendation)

Unless or until the development planning process takes the new flood situation into account, we will see inappropriate planning decisions such as that in Appendix J..

As the Framlingham Neighbourhood Plan is now being reviewed any relevant recommendations in the updated Section 19 report also need to be included in the consultation process.

2.1.3 Flood Prevention Measures

Both reports include lists of proposals to prevent flooding, but they are very different. Brief titles of the relevant preventative measures from each report are listed in the table below.[1] For convenience, a copy of the proposals in the Amazi report is provided in Appendix C. and a copy of the SCC background is in Appendix D.

The Amazi report makes a distinction between ideas for further assessment (in its section B) and recommended actions (in its section C). Most of the identifiers of flood prevention measures in Amazi start with 'B' (i.e. they are ideas, not recommendations).

The Section 19 report also lists a set of (different) flood prevention measures but it gives them all the status of recommended actions. The FFRR suggests that half a dozen of these SCC recommendations should be demoted to 'ideas', and evaluated for technical and financial feasibility alongside the ideas in the Amazi report, as indicated in Appendix K. and shown greyed out in the table.

Fram Town Council Amazi report		Suffolk County Council § 19 report	
	<u>Divert</u>	S.M1	Investigate potential NFM projects[2]
B10.1	Widen River Ore from Mere to downstream of the Town	S.M2	Investigate potential new/additional highway drainage assets on New Rd
B10.2	New (additional) conveyance channel /culvert through the town	S.M3	Improve drainage system on the Elms car park
B10.3	Keep (water) flow in the river channel	S.M4	Investigate options to connect surface water on Brook Lane and Fairfield Road back into the river
	<u>Attenuate</u>	S.M5	Investigate improved drainage / storage at the bottom of the field east of Fairfield Rd & Woodbridge Rd
B10.4	Enlarge and dredge the Mere	S.M9	Investigate attenuation in the upper catchments, e.g. reservoirs, storage ponds, wetland areas
B10.5	Storage in areas upstream	S.L1	Deliver capital interventions that are economically, technically & environ-mentally feasible & acceptable
C17	Continue to engage with Anglian Water re. mtce of their systems throughout the town and foul water flooding at Kettleburgh Rd	S.L2	Investigate options to enlarge the capacity of the culvert below The Mills on Brook Lane
	<u>Protect</u>	S.L3	Investigate enlarging the culverts below Fairfield Road connecting the
B10.6	Wall around weir to increase storage capacity of Mere		
B10.7	Property Level Protection		
B10.8	Town Wide Demountable Barriers		

1 The SCC recommendations were not numbered, so the table uses the identifiers from Appendix K.

2 NFM stands for Natural Flood Management. It encompasses both structures intended to hold back water using natural materials, and increasing the soil's capacity to infiltrate water. One review comment remarked that they would like to have seen explicit mention of water engineering using beavers.

Fram Town Council Amazi report		Suffolk County Council § 19 report	
B10.9	Raised Walls Along the Channel		watercourses with the main river
	Resilience	S.L4	Improvements to highway drainage network to manage surface water if investigation suggests it is viable.
B10.10	Properties at risk to be flood-resilient to enable rapid reinstatement if similar flood event occurs again		

It is not the role of the FFRR to judge the merits of each proposal, but **we would like to offer our local knowledge to work with the SCC and the Environment Agency to explore and discuss their feasibility**.

Nonetheless, the FFRR considers public health matters (C17) and measures to hold back water upstream (B10.5, S.M1, S.M9) should be worthy of immediate recommendation (so they are not greyed out).

Farmers who work the catchment land will typically still need to propose each specific scheme to the Environment Agency for technical assessment. But the overriding question for farmers is largely economic - they require funding (whether public or private) because they are being expected to invest in constructing schemes that could risk flooding their productive land in order to benefit homes and businesses downstream.

Given Natural Flood Management (NFM) measures are recommended repeatedly, the FFRR needs an estimate of how much excess water there was in Fram at the peak of the flood. This would allow us to estimate the combined capacity of the upstream NFM schemes that would be necessary to be effective.

We understand that the stated action "Deliver capital interventions" is a placeholder, because consultants have been employed to identify capital works. Nonetheless, surely a little more detail could have been attempted here. Otherwise the recommendations seem too vague and not sufficiently ambitious. The report at least needs to explain the process that will determine how (and whether) each recommendation will be funded.

Two specific notes follow that need to be highlighted in relation to a couple of the flood prevention proposals in the Amazi report (both happen to be about Framlingham Mere):

> **B10.4 Enlarge and dredge the Mere**: To quote Mr Edmunds report (see Appendix E.): '*More dredging would simply make it easier for water to flow across the Mere and build up trying to enter the town and make the downstream flow worse.*' This is indeed true if the proposal is to dredge silt from *below* the normal surface level of the Mere. However, the proposal makes more sense if it is taken to mean dredging mud from *above* the normal level – i.e. mud that surrounds the natural extent of the pool in the middle of the Mere under normal conditions. The idea then would be to carve out more capacity from the larger bowl of the Mere – to hold more water when the level rises during excess rainfall. The Mere was dredged in 1992 and it is believed it has not been dredged since.
>
> **B10.6 Wall around weir to increase storage capacity of Mere**: We should point out that the EA has already modelled this proposal, and the Amazi report says "*The Environment Agency modelling showed little benefit except to The Elms (see Table A8.1 – 'Mere enhancement')*" The conclusions of the EA's modelling are quoted in that table and should be read in full. One selected quote is added here: "It is

important to note that increasing capacity of the Mere is likely to help reduce risk in more extreme events under climate change (not tested here)..."

Two variants of the above proposals for the Mere have also been suggested by reviewers:

- Similar to B10.6 (wall around weir), except also building a sluice over the outlet of the Mere to control the flow into the downstream river through Framlingham. Restricting the outlet could result in the Mere filling its basin faster, so a higher bank (probably more robust than a wall) would be needed at the southern end of the Mere, particularly running along the boundary of the Elms car park to protect the accommodation just behind it. The Mere would in effect become a catchment damn with the ability to rise a further 50 centimetres to 1 metre and effectively capture very significant quantities of water that could be held back and released into the River Ore through the town in a more controlled way.
- As well as dredging around the Mere (as in B10.4), also lowering the normal level of the Mere to leave more capacity before the existing bowl around the Mere fills. This might be achieved by cutting a V in the middle of the weir and onward down the middle of the bed of the river for a distance from the Mere. A V cut is proposed instead of lowering the whole bed of the river because, when the volume of flow is low in summer, it would be confined to the V where it would move faster, thus more likely to flush the V clear of silt.

2.2 No Consideration of the Framlingham River System as a Whole

There is no place in the Section 19 report where all the evidence on how Framlingham's wider catchment / river system responded is pulled together. This is perhaps the FFRR's greatest concern. Without considering how all the separate points of evidence relate, it is not possible to prioritise the actions needed to be taken. Without any prioritisation, it seems too early to recommend solutions, which could make matters worse if upstream water is moved faster into unresolved downstream problems.

2.2.1 Examples of Over-Narrow Recommendations

- It does seem to the FFRR that most of the SCC flood prevention recommendations tabulated in §2.1.3 merely improve the flow of local drains into outlets that are likely to to be sitting underwater during heavy rainfall.
    - For instance, if the drains under the Elms car-park were dug up and improved (as recommended), the public would (rightly) consider it a waste of public money. Everyone's memory is of a car-park indistinguishable from the neighbouring Mere and full of floating cars. So they would expect a solution appropriate to the size of the problem – one that either bolsters the banks of the Mere or holds back water upstream of the Mere. In the future, if such large-scale solutions had been funded and implemented, the car-park drainage would probably no longer be of any concern.
    - The SCC report says at one point that the highway drainage outlets into the river system were below the level of the river. So, no amount of highway drainage would have helped – rather water needed to be kept flowing away from the south of the town, and slowed upstream to reduce the peak entering the town.

- If flow along the central and western sections[3] were improved, would this just cause more flooding into the houses at the south end of Fairfield Road, as well as exacerbating the already-serious undercutting of the road itself (see problems the report overlooks in the East Framlingham section later)?
- If water flow along the Fen Meadow section and then under the bridge at the south end of Fairfield Road were improved, would it just cause more flooding in the industrial area from Fram Tyres onwards?
- Superficially surface flow off fields could be addressed with pinpoint solutions, e.g. "improved drainage assets / water storage at the bottom of the field east of Fairfield Road" (as recommended in the Section 19 report). However, determining where the water should be diverted to afterwards requires assessment of the bigger picture.
- The report does not discuss what happened downstream of Framlingham.
    - The fall from the Mere through Framlingham to Parham has been estimated from mapping as about 1 in 400 and fairly constant over the whole distance. It needs to be established that the low meadows downstream of Fram were not full and backing up into Fram. Otherwise, the higher the water level downstream relative to that leaving Fram, the more slowly water would flow out of the south end of Fram.

Answers to these points would help to start the process of prioritisation between recommendations.

2.2.2 Division into Stages

Perhaps it would be useful to break down Framlingham's system into stages, each consisting of a built-up area with buffer areas upstream and downstream.[4] The goal would then be to hold back water in the upstream, but to ensure water flows rapidly through the built-up area into the downstream buffer, where the goal would be to allow water to spread (e.g. over a flood plain) where it could again be held upstream of the next built-up area.

The downstream area would have to be carefully chosen such that its capacity would be large enough to absorb attempts to speed the flow feeding out of the built-up area above it, without immediately passing the flow on as a problem for the next stage downstream. And there would have to be enough fall between the end of the built-up area and the start of the downstream buffer area to minimize backing up into the built up area – as the downstream buffer fills.

In the case of Framlingham, the question is whether the whole town has to be treated as one stage, or whether the Fen Meadow has enough capacity (and enough fall upstream of it) to serve as a small flood plain between two stages.

> Purely as an example, it might be judged that the capacity of the Fen Meadow is no longer sufficient for it to be useful as a flood plain – perhaps because housing built at its southern end has limited how much it can fill without causing these houses to flood. Then, the whole of Framlingham would become designated as a single stage, and the aim would be to keep the river within its channel across the Fen. This might then drive the need for greater capacity in this channel and more capacity under the

3 By 'central and western', the FFRR means, for example, increases to the volume of the river channel along Riverside.

4 The Section 19 report does divide Framlingham into zones, but only to break down the investigation into manageable chunks, not because there are areas to buffer the water flow between each zone.

bridge at the southern end of Station Road. And this increased capacity would have to be extended right through to the input of the next downstream buffer.

Then the next question would be where the downstream buffer below Framlingham starts – straight after the sewage works, at the Broadwater bridge, or somewhere further downstream? Indeed, if there were not enough capacity and fall between Framlingham and Parham, the two parishes would have to be treated as one combined stage, but that seems unlikely to be the case.

The final question would be, where does the upstream buffer end and the built-up area start? In Framlingham's case there is no choice – there is no room for manoeuvre between the outlet of the Mere and the start of the residential area.

If the demarcations between the stages were clear from the outset, then recommended solutions to each problem in the rest of the report could be judged in the context of their position in the staging.

Clarifying the demarcations between the stages would also allow each landowner along the watercourse ('riparian owner') to be clearer on what their primary goal should be – whether to slow the flow or to keep the watercourse clear. Unless each landowner is clear on their position in the staging, it is hard for them to know which parts of the 'advice to riparian owners' they should follow [6] (Appendix I.). For instance, EA advice such as "*Where possible, dead branches and tree roots should be left in the channel.*" is only really appropriate in an upstream stage, where waterside habitat can take precedence over flood prevention.

2.3 Section by Section Review

2.3.1 Justification for Investigation

Perhaps all relevant items in the table need to be ticked, that is:

There was a risk to life because of flooding?	✓
Internal flooding of one property (domestic or business) has been experienced on more than one occasion?	✓
Internal flooding of five properties has been experienced during one single flood incident	✓

2.3.2 Flood Forewarning

Bearing in mind the speed and severity of the flood and its rapid fall, then the notes of the event by Suffolk County Council represent a good appreciation of the situation, with the following exception.

> The SCC report, (pt1;§2) states, "*The intensity of the rainfall and rapid rise in water levels meant little, if any, forewarning was provided in Framlingham.*"
>
> FTC's FFRR has been informed that manual intervention was deliberately required to relay the high-water measurement to the flood warning system, and that industrial action by EA staff delayed their response for several hours.

Also, it appears that the flood warning system was not directly connected to the gauge reading when staff were not on duty, as seems to have been the practice elsewhere, at least according to a report in the ENDS newsletter [7].

Finally, it would be useful to report how many residents are/were aware of the flood warning services.

2.3.3 Framlingham - Flooding History

The history of flooding in Framlingham given in the Section 19 report (pt1; §3) seemed considerably thinner than expected. This made residents concerned that such under-reporting might reduce willingness to fund flood prevention measures, which led to an exercise to produce a full historical record.

In March 2024, local historian, John Bridges, had already produced an article for Framfare (a local free newsletter) on the history of flooding in Fram [2] (Appendix B.). This was built on to produce a report on the History of Framlingham Floods [1] (Appendix A.), which found evidence of 36 floods in Framlingham since the 1850s include 21 that flooded property. It also managed to chart the relative severity of the 9 most severe floods – based mainly on archival photos and newspaper reports.

Babet was found to have been the most severe flood recorded in Framlingham – some 6 inches deeper than the previous deepest in 1879 (a notoriously wet year in which three of the worst five floods in Framlingham occurred).

This historical record was intended as input to the 'Flood Rarity Report' being produced by the Environment Agency. Nonetheless, the FFRR hopes that a future version of the Section 19 report for Framlingham will incorporate a summary and refer to it, so that it becomes part of archival records for reference into the future.

2.3.4 Flood Risk Predictions

The Section 19 report recommends "*Improved understanding of fluvial and pluvial flood risk within the town through updates to hydraulic modelling to inform potential capital works.*" The FFRR understands that EA has scheduled in revision of the modelling for 2026/27.

Certain flood prevention schemes (such as holding back water upstream) are insensitive to the precise details of the modelling within Framlingham. In these cases, as the saying goes, "The perfect is the enemy of the good". So the FFRR asks that such schemes will not have to sit waiting until the modelling update is complete, which could unnecessarily hold back work for 2 or 3 years.

Part 2 of the SCC report repeatedly states that flooding correlated closely with predicted flood risk maps. Indeed, there are only two cases where the report states that flows were not understood relative to the modelling:

> Pt2;§1: "*On Saxtead Road there was flooding reported due to combined surface water/pluvial runoff from the roads and fields. This is underrepresented on the national flood risk mapping and needs further investigation.*"
>
> pt2;§2: "*Simultaneously, surface water run-off was rapidly flowing towards Brook Lane from the fields to the south, adding to the floodwater. This was described as 'a waterfall' by residents. The full extent to which this added to the flooding is less well*

understood as this overland flow path is not well represented on the national mapping."

It seems that the reason for recommending an overhaul of hydraulic modelling has been omitted from the report, because it is surely not solely due to these two minor wrinkles (which relate to pluvial flow anyway). The FFRR understands that the experience of Babet showed that the modelled flood zone extents were incorrect. However, discussion of what exactly was incorrect in the modelling seems to have been missed from the report, even though a recommendation to correct the modelling *has* been included.

Note that recently (8 Oct 2024 meeting) the EA has accepted the offer from the FFRR to provide locally measured water depths during storm Babet to feed into and update their modelling of flood zone predictions.

Finally, the FFRR has found that the predicted flood risk maps (pt1;§4 Figs 4 & 5) are difficult to use to identify where the priority problems are located in the town. It is hard to see where the predicted flood risks coincide with residential or commercial properties. A way to highlight these overlaps within the map would be useful in future.

2.3.5 Assessment of Flooding Sources

The SCC assessment lacks detail on the timing of events as they unfolded. These can be found in FTC's Amazi report, in particular in Appendices B2 to B8.

In general, the SCC assessment picks up most of the likely pinch points in its analysis, but with the following exceptions:

The North Framlingham section (pt2;§1): The report states that Framlingham College and Suffolk Wildlife Trust should, "review their maintenance / management of the Mere," *which results in the later action point: "ensure the river exit is kept clear of waste & debris*". However, upstream of Framlingham the removal of any obstructions to water flow would surely **worsen** flooding in the town (unless the theory is that a blocked outlet led to a catastrophic overflow elsewhere than at the intended exit point?).

The report states that the inconsistency between flooding reported on Saxtead Road and that predicted by national flood risk mapping needs further investigation. However, this has been overlooked in the list of recommended actions.

The West Framlingham sections (pt2;§2): The report documents events here well, except:

- it omits discussion of the extensive water attenuation ponds that have been included in flood protection designs in Framlingham. Despite being of recent construction, they failed. Specifically, one behind Mount Pleasant, one halfway down New Street and another in the field beside the drive leading up towards New Street Farm (also two alongside Fairfield Road, reported under East Framlingham),
- a more thorough survey of the Brook Lane culvert is provided in Appendix G..

The Central Framlingham section (pt2;§3): This summary is accurate, with its emphasis on the fact that many properties were flooded from the back and front. However:

- it overlooks the question of whether there is sufficient capacity for water to flow through the bridge under the bottom of Fore St, which has always been the point from which flooding starts to back up in the historical records for at least two

centuries. It mentions that the river overtopped the east riverbank to the south of this bridge, which implies that the whole river course here might need widening?

Even if it is believed that a cost-benefit analysis would preclude certain works, they shouldn't be precluded before the cost-benefit analysis.

The East Framlingham section (pt2;§4):

Events here are well documented by the report, particularly emphasizing the effects of pluvial flow, except the following two points:

- As highlighted under the West Framlingham section, it needs to be mentioned that the two new water attenuation ponds (Sustainable Underlying Drainage or SuDs) recently developed in the Castle Keep housing estate alongside Fairfield Road failed. They simply did not fill, not capturing the surface run-off at all.
- No mention is made that frequent flooding of the Ore River lying along Fairfield Road is undermining the road footings. If this should collapse, it could restrict access to the housing on Castle Keep (at least the southern end of Fairfield road) and will be extremely costly to repair. Note that it took SCC nearly 3 years and over £50k in leased traffic lights on Fairfield Road to repair past damage along the southern end of Fairfield Road (FOI request to SCC).
- There is no mention of the Castle Keep electrical transformer, which the flooding on Fairfield Road nearly overwhelmed.

The South Framlingham section (pt2;§5): Again, events here, particularly pluvial flows, are well documented. Except there is one omission:

It says "*Water was emerging from manhole covers on the road and caused internal flooding from a backed-up toilet in one property.*"

This should also mention that in at least one commercial property in this area (Moore's Funeral Parlour) sewage was shooting from the toilet bowl and hitting the roof. Apparently, it then filled the premises to 5-ft deep in sewage within 20mins. Even the level of toilet bowls in the new housing in Castle Keep were rising during storm Babet.

According to Ian Moore, Anglian Water's sewerage pipe from this point to the sewerage works a little further downstream is only 9" diameter, indeed this is the case for the whole of Framlingham Town.

This should be investigated to determine if it is indeed the case and if this diameter of pipe is sufficient? More especially given the extensive housing development in the town since the agreement of the Neighbourhood Plan in 2017.

This section of the report mentions fluvial flooding but omits to identify which properties it affected, viz. those on the Kettleburgh Road. Also a summary bullet highlighting this fluvial flooding ought to be added to the section summary.

2.3.6 Flooding Summaries

The summaries at the end of each section in Part 2 of the SCC report and the lists of actions at the end leave us with a sense of helplessness at the daunting task of adopting all these recommendations.

Trying to remain positive, the FFRR group has merged the SCC recommendations with those from the Amazi report (in Appendix K.). Next, we shall attempt to prioritise what we

can do ourselves and what will require further discussion and resourcing from District, County Council, National Government or private sources.

Nonetheless, for the next update of the section 19 report, the FFRR urges SCC to similarly integrate the Amazi recommendations with its own. To help expedite this work we offer Appendix K.. It would be most helpful if SCC also assigned relative priorities to the resulting recommendations. The FFRR is more than willing to work with SCC on this exercise, bringing our local knowledge to the task.

3 Conclusions

Framlingham Flood Resilience and Recovery Working Group (FFRR) was formed in the immediate aftermath of the Babet storm of October 2023.

Suffolk County Council published its statutory 'Section 19' report in July 2024, recording events during Babet and recommending actions to be taken by the various responsible agencies. This document gives the FFRR group's thorough in-depth review of that report.

Through the FFRR, Framlingham Town Council had acted rapidly after Babet, commissioning a consultant from Amazi to compile an early report with similar scope (endorsed by SCC) to get the process moving in advance of SCC's statutory Section 19 report.

This review has three main concerns with the Section 19 report, which it hopes will be addressed in a future version:

- the report exhibits a number of gaps, that can be easily remedied by drawing on the earlier Amazi report or the present review. Specifically, the four main omissions are:
  - no consideration of procedures /resources to sustain a maintenance programme
  - no mention of the sewerage system and public health matters
  - no changes to development planning guidance or enforcement in the light of Babet
  - no specific proposals for flood prevention of sufficient scale or ambition
- there is no place where the report draws together all the pinpoint observations and problems to take a wider, whole-system view of Framlingham's water flows
- the recommendations need to be integrated with those from Amazi then prioritized.

Addressing these concerns is critical to ensure that subsequent cost-benefit analysis can identify and set the levels of funding required to make towns such as Framlingham more resilient to natural events in future.

4 Glossary

Fluvial flood	A watercourse (river or stream) overflows
Pluvial flood	Rainwater floods on its way to a watercourse (over fields, roads, etc)
FFRR	Framlingham Flood Resilience and Recovery working group
FTC	Framlingham Town Council
EA	Environment Agency

LLFA	Lead Local Flood Authority (Suffolk County Council)
NFM	Natural Flood Management (both natural structures & better soil infiltration)
SCC	Suffolk County Council

5 References

[1] "Framlingham's Flood History" Bob Briscoe (Sep 2024)
homefarmparham.co.uk/history/Fram/2024HistoryFramFloodsSummary+Detail.pdf

[2] "The Framlingham Floods; An Historical Retrospect" John F. Bridges, Framfare (Mar 2024)

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