

# Appendix C

## Consultation Information

## Summary of responses received during the Draft Thames CFMP consultation period

This table contains extracts from all the responses received during the Draft Thames CFMP consultation period from 25<sup>th</sup> January to 25<sup>th</sup> April 2007. Responses were grouped into 16 main categories and in Chapter 1 we have described how each of these issues have been addressed. Issues that are particularly specific or complex are detailed separately after the table.

Questions asked in the Thames Region CFMP Summary Document, January 2007:

1. Whether you agree /disagree with the approaches proposed to manage the long-term flood risk within Thames Region and why.
2. The opportunities for these proposals to be implemented through the work of your organisation.
3. Any areas where these proposal could conflict with the work of your organisation.
4. What you need to do – and what you need from us – to implement these approaches.

**Note: \* - Issue number indicates which generic issue in Table 1.4 (Chapter 1) relates to the comment.**

Name of respondent	Question response	Summary of main issues raised	Generic Issue Number (*)
East of England Regional Assembly (Alan Wheeler)	General comments	Welcome the production of the CFMP as it provides a valuable strategic policy context for future flood risk management. The Regional Assembly will continue to work cooperatively with the EA and will urge local authorities to play their full role in the process.	16
		Advise only a small portion of the East of England lies within the Thames Catchment, however it should be noted that substantial additional growth is proposed in this part of the region within the East of England Plan, particularly within Essex and Hertfordshire. According to the map on page 34, the East of England part of the catchment is characterised by 'undeveloped natural flood plain' and 'narrow flood plains and mixed land use', with some limited areas of 'developed flood plain with built flood defence' in the lower Lee valley and a very small area shown as 'major urban expansion in or close to flood plains'. We do not know how this characterisation was arrived at, but given the scale of proposed development at several locations in Essex and Hertfordshire we do question	15

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		whether there should not be other areas included in this last category.	
South East England Regional Assembly (Jorn Peters)	General comments	<p>Broadly welcomes the CFMP providing a consistent framework to address flood risk in the long term.</p> <p>Suggest that it is not always clear how the key messages for the different catchment types were developed from the generic policy.</p> <p>Suggest that the status of the CFMP and the relation of the CFMP to Development Plan documents requires further development.</p> <p>Request some details about how the CFMP would be used as a tool to target funding for the measures and actions proposed in the Strategic Action Plan. This could inform and add strength to their Implementation Plan.</p> <p>Is there opportunity for the monitoring of the CFMP to link with monitoring requirements for the South East Plan and Local Development Documents?</p> <p>Welcome the provision of an overview of the broad scale of flood risk, and suggest that the CFMP can inform the SFRA's, although many of them have already been completed.</p> <p>Suggest that linkages to other sources of flooding and historical events will be helpful to input into and make consistent other flood risk assessments.</p> <p>Agrees with the strong emphasis on the need to consider and adapt to climate change.</p> <p>Welcomes the strong emphasis on making existing and new development resilient against flood risk. Suggest on a specific level it would be useful to apply the flood risk vulnerability classification for types of development set out in PPS25.</p> <p>Agree that the building of flood defences is not always the most sustainable solution in order to address flood risk.</p> <p>Welcome the proposed flood plain balance sheet to monitor the effectiveness of a flood plain as a flood defence asset complementing the role of flood defence structures.</p> <p>Acknowledge that flood defence structures will continue to play a significant role in some areas. Comprehensive and detailed data about their quality are necessary.</p> <p>Agree that partnerships are essential.</p> <p>Suggest that the potential benefits of flood risk measures and recreation have not been addressed specifically.</p> <p>Suggest that the CFMP needs to be coordinated with the emerging River Basin Management Plans to integrate flood risk and water quality.</p> <p>It would be useful if the CFMP explained if/how more specific approaches and strategies,</p>	<p>12</p> <p>7</p> <p>12</p> <p>7</p> <p>11</p> <p>4</p> <p>2</p> <p>10</p> <p>9</p> <p>11</p> <p>12</p>

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		which will potentially contain proposals for individual areas, will build on its findings.	
London Development Agency (Nick King)	General comment	Suggest that Action Plans should mention the work of the Regional Development Agencies.	10
Surrey County Council (Tony Gould)	1.	The identification of the different broad types of the flood plain is helpful. Surrey contains examples of each of the types of flood plain identified and as a consequence it would be helpful if greater guidance were given on the relative priorities to be accorded to each when taking forward the action plans.	15
		The Lower Thames Strategy is critical for them to identify what measures are viable and the role of the LPA's in addressing current and future flood risk. Suggest safeguarding of routes for engineering elements of the strategy need to be put in place even though there are uncertainties over details of the scheme.	7
		Suggest that parts of the Hogsmill catchment extend into Surrey and suggest that Surrey County Council and Epsom and Ewell Borough Council should be included as relevant authorities reflecting involvement in the Bonesgate scheme.	14
		2. The County Council has a strategic interest in flood risk management across Surrey. Issues of particular interest include: <ul style="list-style-type: none"> <li>• The extent to which redevelopment and regeneration are development within the flood plain, both residential and town centre development.</li> <li>• The feasibility of relocating vulnerable uses from the undefended flood plain in the long-term.</li> <li>• The scope for major urban expansion in or close to flood plains and the level of compensatory measures that may be required elsewhere in the sub-catchment.</li> <li>• The extent to which flood storage capacity within areas of undeveloped natural flood plain may be required in the long term and how these relate to wider objectives for multiple function greenspace.</li> <li>• Identify issues from the integrated urban drainage pilot project on the Hogsmill which are relevant to other urban areas within the area.</li> <li>• The practical consequences of the engineering elements of the Lower Thames Strategy for the County Council.</li> </ul>	16

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	3.	<ul style="list-style-type: none"> <li>The County Council will continue to work with the EA as required by the Civil Contingencies Act and will continue to promote greater awareness of flood risk and plan the necessary response to flood events.</li> </ul> <p>Flood risk management is only one of a number of considerations that have to be considered when developing strategies for future development. Conflicts may arise between approaches in flood management and emerging strategies directing social and economic requirements of an area.</p>	1
	4.	PPS25 and the emerging RSS provide a policy framework which will assist LPA's in implementing the approaches outlined in the strategy. The completion of sub-catchment flood management strategies will help to identify more specific requirements. Where it is desirable to safeguard land for long-term flood management purposes this needs to be built into relevant spatial planning strategies.	7
			15
Bexley Council (Clare Loops)	1.	The Council considers that the main messages for the region are reasonable and are in line with PPS25. Acknowledge that for Bexley Council future flood risk management will be addressed through the Thames Estuary 2100 project. Suggest that discussions with the Council should also occur in advance of public consultation.	16
	2.	There will be opportunities to implement the CFMP through Local Development Documents within the Local Development Framework.	11
	3.	<p>Suggest that it is difficult to see if the main messages of the document will conflict with their Local Development Framework. There may be conflict with proposals in Appendix D, London Rivers – Marsh Dykes Policy Appraisal, and the proposals</p> <ul style="list-style-type: none"> <li>Considering re-alignment of development and defences to make space for the river; and</li> <li>Using isolated areas of undeveloped natural, or semi-natural floodplain at Crayford Marsh and Erith Marsh to make space for extra temporary flood attenuation or storage areas.</li> </ul> <p>Suggest that the Council will need to review the TE2100 project before it can determine if</p>	1

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	4.	there are any conflicts with the proposals.  Bexley Council is a key stakeholder for the TE2100 programme and will need to work closely with the EA in considering opportunities and actions for the Marsh Dykes Catchment. This should be consulted in advance of the public consultation	8
Cherwell District Council (Sharon Whiting)	1.	The Council agrees with the approach as they are consistent with PPS25.	16
	2.	The Council is committed to reducing flood risk throughout its District by seeking to consent development which is sustainable and consistent with PPS25.	
	3.	The Council is mindful that it has to weigh up many planning policies to reach planning decisions to ensure sustainable development. There may be occasions where the need for a particular development on a brownfield site overrides absolute consistency with PPS25.	1
	4.	The Council needs the continuing cooperation of the EA in advising on strategic flood risk assessments and in evaluating detailed flood risk assessments that are submitted with planning applications. A partnership approach is needed to ensure that the considerable skills of the EA play an important part in coming to sound and sustainable planning decisions.	10
City of London (Janet Laban)	General comment	The City of London does not have any specific comment to make, however wishes to be kept informed of the outcome of this consultation, as well as any consultation regarding the Thames Estuary Project looking at flood prevention in the estuary beyond 2030.	16
London Borough of Brent (Mary-Anne Bye)	1.	The Council agrees with the approaches to manage long term flood risk, recognising climate change and in order to protect the residents of Brent from the risk of flooding.	16
	2.	There are opportunities to implement these proposals including the recreation of natural river corridors through the Brent River Park Project, an Integrated Drainage Pilot Project being undertaken by the Brent North Flooding Group, the adoption of the new Local Development Framework documents that will be compliant with PPS25 and completion of a Strategic Flood Risk Assessment for the borough.	8
	3.	There may be conflicts at potential redevelopment sites where proposed development falls	1

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	4.	<p>within the functional flood plain. These include the Unisys site and sites in Wembley adjacent to Wealdstone Brook. Redevelopment of these areas would meet regeneration objectives but may not meet sustainable water management objectives.</p> <p>The Council is keen to work with the EA to obtain advice on best practice and possible solutions to allow appropriate development on these regeneration sites. In particular Council seeks advice on the application of the exceptions test, specific potential mitigation measures and flood risk modelling.</p>	10, 7
Royal Borough of Windsor and Maidenhead (David Lunn)	General comments	<p>The Council supports this approach in principle as it complements PPS25. Suggests the role and benefits of existing defences should be fully recognised. Suggest that many of the messages are already being implemented by the Council for example preparation of emergency plans and the preparation of the SFRA. Disappointed that the terminology used in the CFMP is different to that of PPS 25 and the SFRA in the definition of flood plain and functional flood plain, and vulnerability of uses, and therefore stops any direct comparison between the CFMP and national and local planning policy. Suggest that as written the CFMP is highly open to interpretation and suggest that the CFMP should be amended to provide consistent terminology with PPS25 or provide examples to aid interpretation.</p> <ul style="list-style-type: none"> <li>Undeveloped natural flood plain – Council supports the intent of this classification unless it is for water compatible uses or essential infrastructure.</li> <li>Developed flood plain with no built flood defences – Questions whether the removal of vulnerable uses is practical or indeed desirable in all cases.</li> <li>Suggest clarification regarding what is intended by safeguarding land and whether this has implications for the Borough. Suggest that this could be achieved through the Local Development Framework upon appropriate notification by the EA.</li> <li>Developed flood plain with built flood defences – Request clarification about what is meant by using areas up and down stream to accommodate additional floodwater. This could be interpreted as including areas which contain villages and other uses, therefore they suggest that the CFMP refers to undeveloped areas up and down stream.</li> </ul> <p>They interpret that the CFMP states that Maidenhead is protected against a 20-year flood event, and request that this statement is checked as it is a lower level of protection that</p>	<p>3</p> <p>12, 15, 17</p> <p>7</p> <p>2</p> <p>6</p> <p>15</p> <p>2</p> <p>12</p>

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		previously advised. Suggest that the CFMP should be amended to reflect that organisations need to work together to manage all sources of flooding, regardless of catchment type.	10
Swindon Borough Council (Philip Smith)	General comments	The actions set out in the Strategic Action Plan are ones which we agree and are already working towards. In particular the emphasis on good design to manage flood risk is welcomed.	16
Vale of the White Horse (Peter Dela)	General comments	<p>The Council is in general agreement with the proposed approach and suggests there is opportunity to implement these proposals through the Council's Local Development Framework. The submission raises a number of questions including:</p> <ul style="list-style-type: none"> <li>• "On page 8 of the summary document, the main message is to maximise capacity of the flood plain. This is supported but can only be achieved if appropriate funding is made available.</li> <li>• On page 11 of the summary document, your long term approach to managing flood risk refers to removing vulnerable development from within the flood plain to recreate functional flood plain. This implies that existing brownfield sites in the floodplain cannot be redeveloped even if they are surrounded by development. If this is the intention of your policy will the EA defend the reasons for refusal at a public inquiry.</li> <li>• On page 16 of the summary document it states '...and the proposals for further expansion may increase the risk even more'. This suggests that the urban expansion within the flood plain is proposed and therefore acceptable in principle. Also, in paragraph 3 starting 'Further development can be accommodated ..' taking Swindon as an example its eastern expansion is close to and, in part, within the flood plain. Is this a tough enough approach when, in Swindon's case, there may be other options/directions for growth? Should the message be saying that development should (as far as possible) be directed away from these areas?</li> <li>• On pages 20 and 21 of the summary document should this section acknowledge that some development may be proposed in areas of undeveloped natural flood plain (e.g. Thames Water's proposed reservoir in Abingdon; Mineral workings etc) and have actions in place if the development takes place?</li> </ul>	<p>2</p> <p>7</p> <p>1, 7</p> <p>1, 7</p> <p>1, 7, 15</p>
Wycombe District Council	1.	The Council is in agreement with the overall need to identify a long-term strategy, provided	



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(Brian Rodgers)		it considers these anomalies below: The Council has concerns with the classifications of High Wycombe and suggest that 8km of built up area would be better recognised as a developed flood plain with concrete channels, which deals with multi source flooding from high intensity summer storms as well as flooding from groundwater.	14
		Concerned with the classification of Marlow as Undeveloped natural flood plain and suggest that the recommendations for this type of catchment contradict current plans to design a flood defence scheme protecting 300 properties in the area. Concern that this classification also ignores the impacts of groundwater.	14
		Suggest that the characteristics for the narrow flood plain state that Environmental assets tend to be more susceptible to damage from low flows. In their experience some of the worst damage is caused by intense summer storms which flush out accumulated pollution from the surface water system into the river. As the River Wye is a BAP designated Chalk Stream it will naturally suffer from low flows.	8
		Ideally the suggestions in this consultation would have been available to influence the Development Plan in its early stages. The Wycombe Development Framework sets out the initiatives and requirements including flood risk assessments, including a requirement to open up access to the River Wye and to create a green corridor along the valley bottom with the Town centre linking the green spaces of Kingsmead, The Rye, Desborough Recreation Ground and West Wycombe Park. A similar policy applies to the Hughenden Stream to link Hughenden Park to the town centre.	6
			7, 10
	2.	The document in its present form conflicts with proposals in the Wycombe Development Framework relating to the stated need to open up the River Wye through the town centre. The Council has expressed concern over the level of maintenance of the rivers in the District with the frequency of clearing debris and the level of monitoring. This is of concern as the River Wye and Hughenden Stream are subject to rapid rise following intense rain due to the existing surface water system and debris in the channel can easily cause local flooding. Concern with the statement that the EA will continue with its current level of maintenance as it is not considered adequate.	1, 7, 10
	3.	The priority is to understand the local implications of the overall plan which will need input	3
			15

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		from EA staff. Any proposed designation or activity needs to be properly integrated into Plans at District, Parish and County level to ensure there is no conflict and so the proposals are achievable, requiring a coordinated response to consultation documents and will need to take into account requirements contained in the South East Regional Plan.	
RSPB (Colin Wilkinson)	General comment	<p>Support long term vision and will continue to maintain and develop strong partnerships with the EA at national, regional and local levels. RSPB seeks support and strong partnership to deliver landscape habitat creation.</p> <p>Request clarification on how and when the CFMP will be reviewed to ensure the CFMP remains 'on track'.</p> <p>The CFMP must ensure that the integrity of Natura 2000 sites are not adversely affected by any proposals set out in the plan in order to comply with the Conservation (Natural Habitat &amp;c.) Regulations 1994. It must also protect and where possible enhance SSSIs in line with statutory duties under the Countryside and Rights of Way Act 2002.</p> <p>Suggest that the EA needs to adopt more ambitious targets for wildlife habitat creation and restoration in floodplains.</p> <p>Suggests that the cost-benefit analysis is currently skewed towards the protection of build development and therefore favours hard defence solutions, and undervalues benefits for biodiversity, fisheries, recreation and health.</p>	13
	1.	<p>Welcome the proposed partnership approach and recognition of the need to ensure that policies and objectives within the CFMP are translated into local plans.</p> <p>Request clarification of the following points:</p> <ul style="list-style-type: none"> <li>• How will input be recognised and integrated into the adopted local plans</li> <li>• Does the EA proposed to amend the adopted plan in light of comments received?</li> <li>• What mechanisms are in place to manage this process appropriately.</li> </ul> <p>Highlight that as the Water Framework Directive processes are clarified and developed, the CFMP should be sufficiently flexible and adaptive to respond to such drivers. Request clarification of the mechanism and plans that are in place to ensure that the CFMP is compatible with WFD objectives.</p> <p>Suggest that currently the EA is falling short of identifying and implementing landscape-scale improvements to restore floodplain and river environments through the FRM process.</p> <p>Welcome the reference to PPS 25.</p>	5 5, 9,15 9 10 13 13 13 11 2, 9

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	2.	Welcome the development of a 'flood plain balance sheet'.	
		The response highlights a number of opportunities for the RSPB to support and contribute to the objectives of the CFMP. There are clear links between RSPB and the objectives of the CFMP including wetland BAP habitat creation.	9
	3.	There may be occasions where early removal or abandonment of flood defences may be inappropriate unless it is part of a large scale programme of habitat restoration and creation. There may be cases, including to protect biodiversity, where it is important to 'hold the line' at least in the short to medium term whilst more sustainable long-term solutions are being developed.	9
		There may be other examples where a proposal conflicts with designated sites under Natura 2000 or SSSI's. RSPB suggest convene a broad discussion and exploration of the opportunities and constraints. RSPB objectives require strong political support for their work and close partnership working with the EA to enable them to deliver and support the approaches to flood risk management and landscape scale habitat creation promoted in the CFMP.	5 5
National Trust Thames and Solent Region (Joanne Hodgkins)	General comment	Recent work on a Water Resources Risk Assessment for the Trust indicates that 5.6% of Trust land and around 1800 Trust buildings are in flood risk zones, 120 Trust properties are at risk of flash floods and 43% of the land area of England and Wales drains through their properties.	12
	1.	The Trust welcomes the approach of managing the risk of flooding and away from reliance of flood defence. Strongly support the restoration and recreation of natural river corridors, channels and floodplain and suggest that this should also aim to enhance biodiversity, safeguarding land which can aid storage of water from development and reduce run-off from agricultural land.	9
	2.	The Trust has huge potential to restore and create wetlands and water dependent features in the landscape and provide some flood storage. Examples of existing partnerships include restoration of the River Cole in Oxfordshire, works to enhance the River Wandle	9

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	3.	<p>where it flows through their Morden Hall Park property and land use management projects by their tenant farmers.</p> <p>Conflict may occur on tenanted farmland where the tenants need to derive a living from various agricultural enterprises and increased storage of water may decrease the area of land they have available to graze or grow crops.</p> <p>Flood risk management will need to consider the risks posed by flood waters including pollution.</p> <p>Suggest amending summary issue 8 to include impacts (both beneficial and detrimental) that will be addressed at the next tier of assessment. (also note email re Infrastructure)</p> <p>Climate change is likely to increase the risk of flooding and assets may not be able to be protected.</p> <p>Floodplain and river restoration projects will require good working partnerships. The CFMP must be clear and consistent across the region and must be consistent with other plans such as the River Basin Management Plans.</p> <p>New funding may be required to support public agencies and NGO's to restore catchments.</p>	<p>1</p> <p>5, 8</p> <p>3, 6</p> <p>11, 10</p> <p>10, 11</p>
English Heritage (Jane Sidell and Alan Byrne)	General comment	<p>Welcome the opportunity to discuss specific plans and work closely with the Agency in order to discover potential areas of conflict early on, and devise mechanisms to safeguard sites without obstructing the work of the EA.</p>	16 7
	1.	Supportive of approach provided that the historic environment is taken into account and adequately protected where possible.	5
	2.	Implementation possible provided that the proposals do not conflict with their own duties to protect and enhance the historic environment.	1
	3.	<p>It is likely that there will be circumstances where the proposals could conflict with the work of English Heritage by detrimentally affecting the historic fabric and archaeological heritage of areas.</p> <p>English Heritage are likely) to be involved as advisors or consultees on schemes and would</p>	1

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	4.	prefer to be consulted early on with specific details of the development in order to discuss with the Agency any likely damage and necessary mitigation to the historic environment.	5, 9, 10
Natural England (Russ Money)	1.	<p>Natural England broadly agrees with the proposed approaches to manage long term flood risk.</p> <p>In particular welcome proposals to encourage natural floodplain functioning in undeveloped floodplain and floodplain attenuation upstream of 'developed flood plain with defences'. A significant contribution towards wetland biodiversity action plan targets could be delivered through this approach.</p> <p>Welcome proposals to use regeneration and redevelopment opportunities in 'developed flood plain with typically concrete river channels' to recreate river corridors and incorporate other flood risk management features that also provide wildlife and greenspace benefits.</p> <p>Suggest that this could also be extended to the category ' developed flood plain and no built defences'.</p> <p>Suggest the category 'Major urban expansion in or close to floodplains' would benefit from some examples of the key design features one might expect to see in the new development.</p>	<p>16</p> <p>2, 9</p> <p>2</p> <p>12, 15</p>
	2.	Suggest some key elements are strongly aligned with Natural England priorities including recreation of wetland habitat in line with the UK Biodiversity Action Plan. Natural England would strongly welcome the opportunity to work with the EA to develop a regional habitat creation programme and a strategy for attenuation on undeveloped floodplain. The CFMP also links to Natural England's priorities to provide increased opportunity for people to enjoy the natural environment, e.g. recreation in river corridors.	5
	3.	The main area of potential conflict lies within the category 'developed flood plain with no built defences' and the implementation of large scale capital schemes that may impact on sites of nature conservation importance. Impacts on designated sites will clearly be a key consideration in proving the sustainability of schemes.	1, 5
		<p>Three key areas where Natural England and the EA should work closely together:</p> <ul style="list-style-type: none"> <li>Wetland BAP delivery.</li> </ul>	9

Name of respondent	Question response	Summary of main issues raised	Generic Issue Number (*)
		<ul style="list-style-type: none"> <li>Biodiversity enhancement and high quality green space provision in developed areas.</li> <li>Detailed consultation over strategies and schemes that may impact on designated sites.</li> </ul>	
Community Support Group South and Thames Awash, Members of Thames Flood Forum (Ian Thompson)	General comments	<p><b>Page 1 Para 3</b> 'The plan identifies where further work is needed'  <b>Comment:</b> The plan requires to implement Clive Onions' recommendations re: Hurley – Chertsey section of the River Thames as a principle.</p> <p><b>Page 1 Para 5</b> ' 'Slough' section of River Thames'  <b>Comment:</b> This section of the River Thames between Datchet and Teddington relates to 29,000 people and 11,700 properties at direct risk of flooding. Thus relates only second to London in population density and therefore has second level of priority to funding and flood prevention action by DEFRA and the EA and requires to be recognised within the plan.</p> <p><b>Page 3 Para 3</b> 'Structural flood defences will not always provide protection'  <b>Comment:</b> Time increases continuing maintenance costs of fixed structures, together with an increasing deterioration of protective ability, and a limit of function finality/replacement. This factor concentrates the priority to preserve natural flood plains together with their interactive water courses. Thus highlighting future intended flood protection policy.</p> <p><b>Page 3 Para 3</b> 'New policy on development and flood risk'  The EA now accept that 'flood risk management aims to make it safe without increasing flood risk elsewhere'  <b>Comment:</b> The EA now comprehend that the MWEFAS scheme did increase the flood risk elsewhere and the scheme did entail that design concept confirmed in correspondence, and that principle was wrong and therefore a continuing open door for future litigation and is seen as a risk where human control of flood alleviation structures is involved. Thus the change of policy to work with nature instead of an increase in the attendant risk of social bias due to mis-control and defective design will not again be replicated.</p> <p><b>Page 4 Para 3</b> 'The EA claim that they maintain flood plain channels'  <b>Comment:</b> We see little evidence of this by example, York Stream Maidenhead,</p>	<p>14, 17</p> <p>17</p> <p>2, 3, 6</p> <p>14, 16, 17</p> <p>3, 6, 14, 16</p>

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		<p>Wraysbury River etc.</p> <p><b>Page 4 Para 4</b> 'Storage capacity of flood plain at Maidenhead'  <b>Comment:</b> The Maidenhead/Cookham catchment has been severely reduced to provide housing development and reduces flood storage by newly installed structural containment with flow divergence into a partially blocked York Stream. Relative to Maidenhead this paragraph is untrue at present. Local plans for storage capacity and limitation of development need to be seen to be implemented and not just a wish list item.</p> <p><b>Page 5 Para 4</b> 'Historic flood events. We have not experienced a large scale fluvial event'  <b>Comment:</b> The last natural flood in 1953 was both marine and fluvial. Since that time we have experienced local major events – Lynmouth and Lynton, Boscastle in 2005, Carlisle in 2006, Worcester 2007, Thames 2003 and 1947.</p> <p><b>Page 5</b> Consequence Chart  <b>Comment:</b> Thames 2003 flood event is missing from the chart. The extent of flooding from Datchet downstream in 2003 was far greater than in 2000. The reason that the 2003 event differs to previous flood events is entirely due to mis-operations at the Jubilee River by the EA causing a superimposed flood level between Datchet and downstream with water level disproportionate to the events' natural level in one section only of the Thames River. The conclusion drawn is that the EA do not refer to 2003 due to it being a litigation sensitive event containing a negligence issue for themselves. Having set up the FRAG and commissioned a report to the value of £1½m relating to four volumes. Therefore the non inclusion of 2003 as a fact irrespective of blame devalues the document.</p> <p><b>Page 6</b> Undeveloped natural flood plain, Berkshire  <b>Comment:</b> We concur wholeheartedly with this principle; it works with nature and is in accordance with Dutch conclusions regarding correct and modern flood protection policy and principles, but is dependent on the EA being able to deliver on two points:</p> <ol style="list-style-type: none"> <li>1) Preventing any further development that compromises capacity</li> <li>2) Maintaining flood plain watercourses that provide efficiency for the flood plain to</li> </ol>	<p>14</p> <p>17</p> <p>12</p> <p>17</p> <p>1, 7</p> <p>1, 2, 3</p>

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		<p>function. Little evidence of either point is discernible with central government interference and contra policy and lack of visual progress at the watercourses by the EA.</p> <p><b>Page 6</b> Developed flood plain with built flood defences – Maidenhead – final para.  <b>Comment:</b> This statement is not correct re: Maidenhead. Upstream gate defences prevent flood water overspill at Cookham and North Maidenhead, with Dorney, Bray, Eton and Windsor being circumvented by the Jubilee River, thus reducing the flood plain capacity in one area and not utilising it where capacity is available. There is no clear policy for the integrated use of the flood plain and Jubilee River in the Maidenhead section of the River Thames.</p> <p><b>Page 7 Section 4</b>  <b>Comment:</b> How do the EA intend to remove practically, the properties out of the flood plain? Opening up more river corridors to provide more flood plain. This concept needs to be explained in a practical sense. The EA need to concentrate in preserving the dwindling existing flood plain and ensuring that they have powers to place a moratorium on further development in these locations; if not their whole policy of national flood plain management which we support will collapse.</p> <p><b>Page 8</b> Retain more water on flood plains and improve capacity.  <b>Comment:</b> The EA require to write the co-jointed action into the present MWEFAS system. The EA need to be held to this intent as it is the only practical solution into the climate change future.</p> <p><b>Page 9</b> Catchments  <b>Comment:</b> This intent is the plan required from Hurley to Chertsey. The local authorities must support it and enforce protection of the flood plain through planning approval process and the Government must not continue to undermine the EA and local authorities with political short-term development proposals overriding the long term future and safety of established riverside communities.</p> <p><b>Pages 10 and 11</b> Developed flood plain with no built flood defences</p>	<p>17</p> <p>1,2,7</p> <p>2</p> <p>1, 10</p> <p>12, 15</p>



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		<p><b>Page 11</b> denotes 'we do not anticipate major flood defences being constructed within the near future'  <b>Comment:</b> This statement infers that the Lower Thames Study containing channels for diversion of flows is no longer intended to proceed within the foreseeable future.</p> <p><b>Page 13 para 2</b> Characteristics of the catchment  <b>Comment:</b> Continuance of ongoing maintenance regarding the life cycle of permanent flood alleviation structures must be integrated with the EA's intended new policy of ensuring flood prevention works or provisions do not pass risk from one area to another and socially disadvantage residents downstream of a flood alleviation system.</p> <p><b>Page 16 para 3</b> re: setback of housing developments  <b>Comment:</b> This requirement must apply to Bray, Dorney, Windsor and Eton flood plain lands as these areas become active flood plain again when and if a one: one hundred event occurs this eventuality is currently within the EA's stated flood plain provision. Again the requirement to prevent flood plain development as previously commented and is part of this principle.</p> <p><b>Page 18 para 2</b> combination of fluvial and ground water flooding.  <b>Comment:</b> The EA have confirmed at TFF meetings that they have little knowledge of groundwater flows and levels between Cookham and Wraysbury, yet constructed the Jubilee River flood alleviation scheme without groundwater survey (as confirmed at the 1992 public enquiry). Unfortunately 15 years have passed and only now are the EA becoming aware that groundwater levels and fluvial events are linked and that development in gravel flood plains can affect the consequences of high volume water flows in both rivers and flood plain. Again the requirement to implement a moratorium on development in flood plains is heightened between Cookham and Chertsey.</p> <p><b>Pages 20 and 21</b> Strategic Action Plan Our Role  <b>Comment:</b> There is a requirement to include the following: Point – 'Correctly operating flood control'</p> <p>Undeveloped natural flood plain</p>	<p>17</p> <p>3, 15</p> <p>7</p> <p>1, 7</p> <p>14, 15, 17</p>

Name of respondent	Question response	Summary of main issues raised	Generic Issue Number (*)
		<p><b>Comment:</b> What form does this balance sheet take?</p> <p><b>Section 4</b></p> <p><b>Comment:</b> This statement confirms an intent to utilise flood plains as a policy principle therefore development is precluded and this intent will relate from Maidenhead to Chertsey. All communities require to be provided with detailed EA maps denoting accurate record of land and water courses. These maps should then be utilised for designation of development boundaries.</p> <p><b>Pages 22 – 23 Item 3 –</b> Add actual years ie 2007 – 2010</p> <p><b>Item 4</b></p> <p><b>Comment:</b> This requirement will require the EA and controlling councils to be provided with legislation to enforce flood plain land from development.</p> <p><b>Page 24 Item 1 Section 3</b> MWEFAS Jubilee River end of structural life 2060</p> <p><b>Comment:</b> Natural flood plain will be the primary means of flood protection within the Maidenhead/Chertsey section of the River Thames after 2060. Therefore the requirement to ring fence flood plain is an immediate priority and commence without delay or central government hindrance.</p> <p><b>Page 24 Section 2</b> Attenuation of water in the upstream flood plain</p> <p><b>Comment:</b> This need, recognised by the EA, is the principle that requires adopting and implementing immediately with support that is unequivocal from local authorities to Central Government.</p>	<p>12, 17</p> <p>12</p> <p>1, 7</p> <p>2, 6</p> <p>2</p> <p>2, 10</p>
Thames Flood Forum (Tom Crossett)	General comment	<p>Welcome the CFMP and it helps them to understand the implications at a strategic level, of both emerging flood risk management policies and longer term change in relation to climate change.</p> <p>Suggest the CFMP provides one framework for debate of strategic options and thus for prioritisation of specific initiatives.</p>	16

Name of respondent	Question response	Summary of main issues raised	Generic Issue Number (*)
		<p>Welcome the implicit commitment to make the CFMP a living process.</p> <p>Consider that the full document brings together a great deal of information that is relevant and also optimises the response to social, economic and environmental issues by evidence based defences, community action and development planning.</p> <p>Suggest the summary document does not reflect the structure and content of the full plan.</p> <p>Suggest that the contents pages of the full plan should be included as an appendix to the summary</p> <p>Suggest that the summary document provides a basis for strategic discussion of more specific initiatives subject to more complete discussion of the following topics:</p> <ul style="list-style-type: none"> <li>• Maintenance of channels and existing flood defences. Regular and comprehensive inspection and compliance with evidence based standards should be given high priority.</li> <li>• The practical role of the Environment Agency, Planning Authorities and third parties especially developers and insurers, in implementation of PPS25.</li> <li>• Justification and mechanisms for removal of assets from the floodplain or deciding to make them more resilient</li> <li>• The extent and quality of flood probability information.</li> <li>• Groundwater flows, especially in gravels, and their impact on flood risk.</li> </ul> <p>Suggest that many sections of the plan have a limited “shelf life” and will require frequent updating if the plan is to retain credibility. For example...Section 5.3.1 of the main plan will require immediate update when DEFRA publishes the definitive measures. We look to the Thames RFDC to keep the plan under review. A stakeholder group should also be maintained.</p>	<p>12</p> <p>3</p> <p>7, 10</p> <p>3, 4</p> <p>8, 12</p> <p>13</p>
River Thames Society	General comments	<p><u>Developed floodplain and no built defences</u></p> <p>The CD information, Table 6.2, indicates that this description applies only to the Lower Thames just west of London, and to the cities of Reading and Oxford.</p> <p>The executive summary gives these areas as examples of this type of area. Clarification is needed about whether it applies to small urban areas</p> <p>The main messages for this type of area include the following:</p> <p>‘The most sustainable way of reducing the flood risk will be through floodplain management. In the long-term, this includes vulnerable development from the</p>	<p>12, 14</p>



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		<p>need of repair) could be replaced on a one-for-one basis, with no increase in ground cover, as long as flood risk/resilience is reduced. This would reduce vulnerability. If not, we will have dilapidated houses along the river.</p> <p><u>Developed floodplain with built defences</u> This category includes the area alleviated by the Maidenhead Windsor and Eton Flood alleviation Scheme (MWEFAS).</p> <p>There are a number of points to correct and clarify:</p> <ol style="list-style-type: none"> <li>1. The MWEFAS was operational in Oct 2001, and first used in February 2002, so the opening date you give of June 2002 is misleading</li> <li>2. You state that '<i>At present it is still possible and effective to maintain these flood defences.</i>' 'At present' implies only in the short-term. Elsewhere you explain that you mean they can be maintained until for the life-time of properties, 2050/2060. This should be made clearer in the summary.</li> <li>3. Please clarify the term 'redevelopment', e.g. development on previously developed land including new dwellings and/or replacement on one-for-one basis (e.g. to repair a flood-damaged dwelling).</li> <li>4. You state we will need to make sure that '<i>the natural floodplain is used <u>upstream and downstream</u> of these areas to accommodate additional floodwater.</i>' This should not be restricted to only upstream and downstream of 'channel' defences, such as the Jubilee River. The natural floodplain along the length of the Jubilee/Thames stretch can also be used.</li> </ol> <p>When quoting the numbers of properties at risk of flooding, we should clarify whether the estimates yet include the extended floodplain areas to take account of climate change, eg the 1 in 100year + 20% flow' floodplain. Estimates of the latter should be included.</p> <p>We have found no reference to the groundwater flooding found in low-lying areas on Thames River Gravels – Please refer to Defra's <i>Making Space for Water</i> Project HA5 report on non-chalk aquifers.</p> <p>Greater precision for geographical areas/locations will need to be developed for Strategic</p>	<p>7, 10</p> <p>12, 17</p> <p>6,12</p> <p>4, 12, 17</p> <p>16</p> <p>12</p> <p>8, 15</p> <p>12</p>

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		Flood Risk Assessments.	
		Might it not be helpful to mention how PPS25 is interpreted in the Thames Region, e.g. the EA is stricter regarding safe access/escape than in some other parts of the country.	12
Member of the public 1	General comments	<p>It appears that the above documents fail to comply with the requirements of the Code of Practice on Consultation issued by the Better Regulation Executive of the Cabinet Office, thus the consultation process is fundamentally flawed. As a stakeholder living in a recently flooded Parish on the Thames, I was not notified about this consultation by the Environment Agency. I firmly believe that every Parish and Town Council in the Thames catchment should have been formally notified about this consultation document, and thus given the opportunity to respond.</p> <p>The Thames CFMP consultation appears to change the way in which the EA 'manage' flooding. The traditional building and maintenance of flood defences that <b>reduce the probability</b> of flooding are to be replaced by 'flood risk management' i.e. the administrative process of issuing flood maps and warnings from the comfort and safety of a warm, dry office, in order to <b>reduce the consequences</b> of flooding. I support the concept of 'flood risk management' but believe that all existing flood defences require regular and appropriate maintenance.</p> <p>The consultation states that <i>'the flood plain is our most important asset in managing flood risk. Maximising the capacity of the flood plain to retain water in these areas can have many advantages for people and the natural environment. Future maintenance work on river channels should aim to increase the capacity of the flood plain.'</i> The Environment Agency refers to this as <i>'managed flooding.'</i> I believe that the watercourses are the most important asset, and that floodplains are a bonus. Furthermore it is unfair to deliberately divert floodwater onto undefended villages.</p> <p>The assurances given at the 1992 MWEFAS Public Inquiry have not been kept and the Jubilee River has been detrimental to Datchet and the downstream villages. The consultation refers to increasing the capacity of the flood plain, yet surely in practice the MWEFAS project has significantly reduced the capacity of the flood plain.</p> <p>The local watercourses are the primary element of the flood defence system. These watercourses (especially the Thames) are suffering from serious lack of maintenance. In particular, the Environment Agency has failed to dredge the Thames for flood defence</p>	<p>13, 17</p> <p>6</p> <p>3, 6</p> <p>14, 16</p> <p>3, 16</p>

Name of respondent	Question response	Summary of main issues raised	Generic Issue Number (*)
		<p>purposes since 1995, thus increasing the probability of flooding. (i.e. bed-rise flooding). The lack of watercourse maintenance is leading to ever-rising groundwater levels, with consequential loss of capacity. Therefore in any flood event, the flood water is liable to arrive earlier and rise more quickly, finally peaking at a higher level. The Environment Agency is responsible for all aspects of both designated main-river watercourses and flood defences. I believe that the Environment Agency should be legally bound to ensure that both watercourses and flood defences are properly maintained, rather than in a position to just abdicate responsibility.</p> <p>Please explain in detail why Datchet and Wraysbury are in two different areas.</p> <p>Your consultation states 'A reliance on flood defence is no longer sustainable'. Bearing in mind that the EA has yet to complete the £110m Jubilee River, and has only recently taken over responsibility for all the Critical Ordinary Watercourses (designated Main Rivers), can you please explain in detail what this sentence means and why you believe this to be the case?</p> <p>Your document states 'The flood plain is our most important asset in managing flood risk'. I believe that the watercourses, and in particular those designated Main River and the River Thames itself are the most important asset in managing flood risk, and that the flood plain is a bonus.</p> <p>Your document states 'Improving the effectiveness of this flood plain can reduce flooding to properties, both locally and downstream'. I believe this statement may be true (i.e. 'can reduce flooding' due to peak level attenuation) but only on the understanding that existing watercourses are properly maintained and therefore carrying flood water in an efficient and effective manner.</p> <p>Your document states 'Managed flooding of some areas of the natural flood plain will reduce the risk to some communities'.</p> <p>I believe that 'managed flooding' i.e. transferring the problem from one area to another, is deliberately unfair and inequitable.</p> <p>Your document states 'Future maintenance work on river channels should aim to increase the capacity of the flood plain'. I am not entirely sure how this is to be achieved, perhaps by installing and using water retaining weirs? I do believe that the watercourses, and in particular the River Thames, are suffering from long-term neglect of maintenance leading to reduced carrying capacity and ever-rising groundwater levels.</p> <p>In a flood event, this can lead to floodwater 'out-of-banks' earlier, rising more quickly and</p>	<p>14, 17 12, 17</p> <p>2, 3</p> <p>3</p> <p>6</p> <p>2, 3</p> <p>3</p>

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		<p>finishing at higher peak levels. Apparently, although the EA are responsible for the important (Main River) watercourses, they are neither maintaining them, nor ensuring that riparian owners maintain the watercourses.</p> <p>In addition there is evidence that the EA are refusing permission to re-grade watercourses suffering bed-rise due to sedimentation, which results in back-up problems in times of high-flow, and water shortage in times of low flow.</p>	3
Member of the public 2	General comments	<p>Based on the local knowledge we have and which I do understand is a small percentage of the area under your control I would like to point out that the plan appears to be one of so called "Management" with no direct physical work directed at the problem of flooding. Most of the methods of "managing" the flood risk relate to what to do in the future totally ignoring the potential of rectifying some of the incursions of historical interference. For instance; Environmental Improvements which have reduced flow by choking the watercourse.</p> <p>If I understand some of the inferences correctly it would appear that to save Maidenhead (for example) the weirs above could restrict water flow, potentially back flooding the land above? (My property!).</p> <p>What concerns us most in this document is the word management instead of any real emphasis on improving water flow by actual work. For many years the flood plains have been built on displacing flood water but little effort has been focussed on moving the extra water that has been displaced down the watercourse.</p> <p>Your page 6 "Specific messages for the catchments" suggests "managing" the flood plain. The Thames Conservancy and the EA subsequently have been singularly lacking in ability to reduce the spread of buildings on the flood plain and apart from the Maidenhead flood relief scheme (Jubilee River) it seems as if no other actual improvements to the Thames to increase volumetric flow have been accomplished.</p> <p>How can existing flood plains can be encouraged to maximise their water retention especially by maintaining water channels. Most plants do not require much water during winter when risk of flooding is at its extreme.</p> <p>On page 4 under the title "The flood risk in the Thames Region" there is a statement that appears to be completely untrue – "We maintain the channels to ensure they are free of obstruction and can accommodate high flows" This is entirely against the response we obtained from the Agency when we requested permission to dredge 6 inches adjacent to</p>	<p>6</p> <p>7, 9, 17</p> <p>2, 3, 17</p> <p>6</p> <p>1, 7</p> <p>2</p> <p>3, 14</p>



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		<p>our property which was “No. Natural silting is to be encouraged”</p> <p>This natural silting is self evident all the way between Henley and Marlow and has reduced the capability of the river to handle high flows contrary to your above statement. Over the last 10 years (and 30 years if my canoeing is taken into consideration) there has been little attempt to dredge the channel which has gradually reduced in depth along its margins.</p> <p>The second part of your above paragraph is also self evidently incorrect where you state “We also maintain the riverbanks....” These statements as far as the Henley to Marlow stretch of the Thames should not be included in the document if the Agency has no intention of carrying them out.</p> <p>...Far from looking at new defences it would appear that actually removing silt as well as trees would at least redress the incursions of the recent past and allow a decent flow rate to remove some of the pre flood water to the mouth of the Thames. (Water lost to the sea would not be available to flood the land).</p> <p>All through this document you state the EA carries out work at maintaining the capacity of river channels (and conveniently adding “and structures”); the latter being accurate, the former challengeable.</p> <p>It would be nice to know by removing the cost of work on structures such as Locks and Weirs from the total annual spend just how much money has been spent directly on improving flow through the watercourse.</p> <p>A rather more interesting statistic is used on your page 5 where for; “Every 30 to 100 years the Thames and Lee basins are likely to flood based on the 1947 event”. Further into your document are references to the current view of “climate change” by which I take to mean the effects of “global warming”.</p> <p>In 1947 the cause of the flooding was a frozen land base with significant snow cover. A quick thaw occurred together with a very significant rainfall which was unable to penetrate the ground and transferred directly into the waterways. It is interesting to note that an identical rainfall occurred for the three days preceding the last significant flood a few years ago as that which occurred in 1947. This recent flood high water mark was considerably lower than that of 1947 and did not reach our property.</p> <p>I would suggest that either you base your figures on the global warming statistics OR the 1947 flood base but not both as that is illogical.</p> <p>The other point which is of more academic interest is your 1.7 wherein you suggest storage reservoirs would assist. If we assume the Thames Region will see drinking water shortages</p>	<p>3</p> <p>3</p> <p>3</p> <p>3, 12</p> <p>12</p> <p>12</p> <p>12</p> <p>2, 12</p>

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		in the future then storage reservoirs would certainly assist in minimising that situation. It is obvious that in the UK we do not have an annual water shortage problem only a problem of storage and distribution.	
Royal Borough of Windsor and Maidenhead (Simon Lavin)	General comment	<p>Supports an integrated approach to flood risk management, however suggests that the plan should also include appropriate maintenance of existing rivers and watercourses. Agree that flood plain management has an important role to play in the future management of flood risk and that inappropriate development within the flood plain should not be permitted.</p> <p>Requests clarification of the statement 'Future maintenance work on river channels should aim to increase the capacity of the flood plain'. Where the storage of flood water on undeveloped natural flood plain provides a reduction in downstream flood risk without the deterrent to other properties, this should, where possible be achieved. Future maintenance work on river channels should aim to maintain or improve the capacity of the channel.</p> <p>Suggest the statement 'the natural flood plain is used upstream and downstream of these areas to accommodate additional floodwater' could be interpreted to refer to areas upstream and downstream of the Jubilee River and that reference to 'additional water' is not likely to be well received.</p> <p>Figure 6.1 in the full technical document, "A regional overview of policy selection in the Thames Region (represented by the floodplain)" indicates that Policy P6 – "Take action to increase the frequency of flooding to deliver benefits locally and/or reduce the risk elsewhere" applies to the Thames catchment, upstream of Windsor, in our area. I would question whether this policy is really applicable to the Thames in this area? It is my understanding that flood plain storage is most effective where the volume of available storage is large in comparison to the flow along the river, and the hydrograph shape is short and peaky. Floods on the Thames in our area tend to have long flat peaks and flood plain storage is therefore likely to provide little benefit (in terms of peak water levels) downstream. Flood plain storage measures are however applicable to the smaller, more responsive, watercourses in our area and may well provide localised benefit on such watercourses.</p> <p>The summary mentions the use of flood resilience measures in new properties. In my</p>	<p>16</p> <p>3, 12</p> <p>2, 17</p> <p>14</p> <p>4</p>

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		<p>opinion such measures should only be used in the refurbishment of existing properties, and where necessary in redevelopment. New developments should not be permitted in the flood plain and such measures are not therefore appropriate in new developments.</p> <p>One of the specific messages for “developed flood plain with typically concrete river channels” is that “organisations need to work together to manage all flood sources: fluvial, tidal, surface water and sewer flooding”. While this message maybe particularly relevant to urban areas, and its implementation may prove difficult, I do believe that this message should apply to all types of catchment.</p>	8, 10

## **17. Specific or local issues**

1. Disappointed that the terminology used in the CFMP is different to that of PPS 25 and the SFRA in the definition of flood plain and functional flood plain, and vulnerability of uses, and therefore stops any direct comparison between the CFMP and national and local planning policy.

The Thames CFMP assess all flood risk management issues and thus has been written for a wide audience. Therefore we have tried not to use too much 'planning terminology' in the document. However, in response to this comment we have made the policy unit action plans more focussed on highlighting the planning tools (Local Development Framework, Strategic Flood Risk Appraisal, etc...) and Local Authorities that will be involved in achieving the desired outcomes.

2. The plan requires to implement Clive Onions' recommendations re: Hurley

– Chertsey section of the River Thames as a principle. The CFMP provides a strategic overview for flood risk management. Specific recommendations from previous studies (i.e. Flood Risk Action Group) will be considered at the detailed planning stage prior to implementation.

3. This section of the River Thames between Datchet and Teddington relates to 29,000 people and 11,700 properties at direct risk of flooding. Thus relates only second to London in population density and therefore has second level of priority to funding and flood prevention action by DEFRA and the EA and requires to be recognised within the plan.

AND

This statement infers that the Lower Thames Study containing channels for diversion of flows is no longer intended to proceed within the foreseeable future.

The Lower Thames Strategy is ongoing and seeks to provide a flood risk management solution for the Lower Thames.

4. The MWEFAS was operational in Oct 2001, and first used in February 2002, so the opening date you give of June 2002 is misleading. This is the official opening date and is correct as such.

5. The EA now comprehend that the MWEFAS scheme did increase the flood risk elsewhere and the scheme did entail that design concept confirmed in correspondence, and that principle was wrong and therefore a continuing open door for future litigation and is seen as a risk where human control of flood alleviation structures is involved. Thus the change of policy to work with nature instead of an increase in the attendant risk of social bias due to mis-control and defective design will not again be replicated.

AND

Correctly operating flood control

The MWEFAS scheme and specifically the operation of the gates at Taplow (the start point of the Jubilee River) is carried out in accordance with published operating procedures, which are available on the Thames Flood Forum website ([www.thamesff.org.uk](http://www.thamesff.org.uk))

6. The last natural flood in 1953 was both marine and fluvial. Since that time we have experienced local major events – Lynmouth and Lynton, Boscastle in 2005, Carlisle in 2006, Worcester 2007, Thames 2003 and 1947.

AND

Therefore the non inclusion of 2003 as a fact irrespective of blame devalues the document.

The extract referred to describes the lack of a flood event at the basin scale, recognising that the Thames is a large river basin. We recognise that the 2003

event was significant at a local scale.

7. What form does this balance sheet take?

The balance sheet is proposed as a tool to monitor floodplain gains and losses. It does not yet exist.

8. Please clarify the term 'redevelopment', e.g. development on previously developed land including new dwellings and/or replacement on one-for-one basis (e.g. to repair a flood-damaged dwelling).

Urbanisation can be divided into urban growth, the development of land, and urban redevelopment, the reuse of land already in urban uses.

9. It appears that the above documents fail to comply with the requirements of the Code of Practice on Consultation.

The Cabinet Office Code of Practice on Consultation recommends a 12-week written consultation period. We have applied this

recommendation to the draft CFMP consultation process.

10. Please explain in detail why Datchet and Wraysbury are in two different areas.

The delineation of policy units is based on geographic and flood characteristics for example topography, geology, and depth, velocity and impact.

11. Your consultation states 'A reliance on flood defence is no longer sustainable'. Bearing in mind that the EA has yet to complete the £110m Jubilee River, and has only recently taken over responsibility for all the Critical Ordinary Watercourses (designated Main Rivers), can you please explain in detail what this sentence means and why you believe this to be the case?

The sentence in question relates the increasing fluvial flood risk to the increasing need for risk management activity and deems that building and maintaining more, higher and stronger defences will become

unsustainable. This is based on the assumption that managing the consequences is more sustainable than managing the likelihood of flooding. Therefore a range of approaches will be needed to manage future risk in a sustainable way.

12. Most of the methods of "managing" the flood risk relate to what to do in the future totally ignoring the potential of rectifying some of the incursions of historical interference. For instance; Environmental Improvements which have reduced flow by choking the watercourse.

Our understanding of flood risk is based on knowledge of the current situation and how this may change in the future. This does recognise the legacy of previous decisions and activities. Developing our plan for managing flood risk has challenged these, and any role they may have in the future.

13. If I understand some of the inferences correctly it would

appear that to save Maidenhead (for example) the weirs above could restrict water flow, potentially back flooding the land above?

The weirs on the river Thames are operated to maintain water levels, principally for navigation requirements. There is no intention to change this. In addition any increase in the use of floodplain would be in undeveloped areas,

14. The statement 'the natural flood plain is used upstream and downstream of these areas to accommodate additional floodwater' could be interpreted to refer to areas upstream and downstream of the Jubilee River and that reference to 'additional water' is not likely to be well received.

This is noted and the document clarifies this interpretation.

## List of Thames CFMP Steering Group Members

Name	Organisation
Alan Mason	Environment Agency
Alison Kirkpatrick	Environment Agency
Amanda Nobbs	Defra and Regional Flood Defence Committee (RFDC) Member
Andrew Cook	Environment Agency
Andy Batchelor	Environment Agency
Ben King	Environment Agency
Chris Catling	Environment Agency
Chris Poupard	Regional Fisheries, Ecology & Recreation Advisory Committee (RFERAC) Chair
Colin Candish	Environment Agency
Craig Woolhouse	Environment Agency
David Murphy	Environment Agency
David Ramsbottom	HR Wallingford
Elizabeth Walker	Environment Agency
Geoff Bell	Environment Agency
Graham Cowell	Environment Agency
Graham Kerr	Countryside Agency (now Natural England)
Ian Tomes	Environment Agency
Jean Stidwell	RFDC Member
Joanna Cleasby	SEERA
John Horne	Defra
Linda Aucott	Defra
Nick Reynard	CEH Wallingford
Nigel Jones	RFDC Member
Pete Massini	English Nature (now Natural England)
Peter Borrows	Environment Agency
Peter Ryder	RFDC Chair
Professor Edmund Penning-Rowsell	Middlesex University Flood Hazard Research Centre
Professor Malcolm Newson	Newcastle University
Richard Harpin	Halcrow
Richard Lemon	GOSE
Robin Thompson	Defra
Russ Money	English Nature (now Natural England)
Sarah Lavery	Environment Agency
Stephen Jenkinson	Defra
Sue Reed	Environment Agency
Tim Harries	Middlesex University Flood Hazard Research Centre
Tom Forde	RFDC Member
Tony Gould	Surrey County Council
Wendy Norman	RFDC Member
Yvette Barda	Environment Agency