

Brenda Melton

From: Brenda Melton
Sent: 22 September 2010 16:23
To: 'Willis Sass'
Subject: Flood Risk Regulations - Determination of Flood Risk Areas - Discussion Paper (Our Ref: 8/3h(i))

Sass

Thank you for distributing the above paper at the recent Partnership meeting and enabling us to comment.

Generally, the discussion paper seems to have adopted the right approach but I have a few comments which I hope will be helpful.

It is noted that the early aim of the Regulations is expressed to be to identify the most significant flood risk areas and that it is proposed to attempt to do so consistently, on the basis of predicted flood risk. It is stated in section 1 that the residual risks of flooding are to be assessed and that these are the risks remaining after existing measures have been taken into account. This is presumably aimed at taking such things as defences into account and not simply classifying an area as at risk when it is defended. While, in principle, I would entirely agree with this principle, it does require defences to be maintained to a set standard and it must be recognised that, if this standard is reduced, the risks will rise.

While the IDBs, certainly so far as this office is concerned, have no wish to reduce their existing level of protection, you will be aware of the debate over the Environment Agency standards of maintenance and I am due to attend a meeting next Monday regarding a proposed EA policy of withdrawal from certain fluvial defences. While I am aware that you will not be assessing the direct risks from main river and sea defences, the paper does indicate that flooding from such sources should be taken into account when they interact with flooding from another source. The condition and maintenance regime of Agency rivers and structures will however impact directly on the level of risk within a Council's area and could also cause such an interaction when water discharging from a source to a main river is unable to do so because of the condition of the river. The presence of a defence should also not be taken as removing a flood risk. The risk will be managed and reduced but the very presence of a defence may lead, in fact, to a false sense of security from those living or working behind it and such areas should not be treated as risk free.

I believe that local authorities should consider the infrastructure eg gas and water pipes, telephone lines, electricity cables etc in assessing flood risk. These items of infrastructure may serve a community itself at risk from flooding or may cross land at such risk to serve communities not at risk. The absence of utility services within or crossing the flood risk area during an event needs to be taken into account.

Given the raised political issues regarding "food miles" and the carbon footprint of imports, I consider that agricultural land, particularly the effects of flooding on the higher grades of such land, ought to be taken into account. I also consider that all of these matters should be considered in addition to human health.

It will be vital that a proper assessment of local flooding risks is undertaken and I agree that the local lead flood authority should set such local areas. In addition to surface water management plans, the presence of an IDB, particularly where, like Swavesey, the IDB has a designed low level of protection, should be a relevant factor. It would be interesting to see the equivalent maps as set out in Annex B, for this area.

As Peta Denham has previously pointed out, while local evidence of flooding can be valuable, it should be properly assessed. Flooding could be caused by, for example, a blocked culvert.

Regards
Iain

Iain Smith
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Middle Level Commissioners