

WRINGTON PARISH COUNCIL

The John Locke Room, Silver Street, Wrington, BS40 5QE

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North Somerset Local Flood Risk Management Strategy – Consultation response

This is a comment submitted on behalf of Wrington Parish Council (the Council) in response to the consultation draft North Somerset LFRMS issued December 2013. The comment is made from a Wrington perspective and reflects our experience of flooding within both Wrington village and the wider parish, where we have observed flooding on many occasions.

We are supportive of the proposed LFRMS, which appears comprehensive and generally well researched. However, it isn't easy for us to offer an objective critique bearing in mind the fact that we have recently been advised that funding has been approved for a local flood relief scheme. We would like to take this opportunity to thank the relevant NSC officers and everyone else who helped to secure this funding. On behalf of the residents of Wrington, especially those affected directly by flooding, it is very much appreciated.

The draft LFRMS:

The following comments relate to the respective paragraphs in the draft Strategy and with particular reference to Wrington. Where no comment is offered it can be presumed that the Council is supportive.

1.1 – Introduction/Context

It is arguable that 'flooding cannot be wholly prevented' in many areas and that it is as beneficial as is implied here. Flooding is not essential to recharge groundwater sources, can have very negative impacts on ecosystems and biodiversity, and should certainly not be encouraged. It is our opinion that every effort should be made to prevent flooding to housing and other property in active economic use.

2.2 – Objectives

Referring to Table 2-1, LFRMS Objectives, item 5, to some extent this conflicts with paragraph 3.2.2, where the requirement is stated more strongly. In terms of the anticipated outcome, it should not be just 'more likely' that site drainage on new developments will be managed sustainably, but absolutely essential.

3.2.1 – Flood risk from surface runoff and ordinary watercourses

It has clearly been accepted that Wrington is affected by surface water runoff and by issues created by the inadequate capacity of the ordinary watercourse which runs

through the village, with this to some extent the result of poorly planned built development. However, there is another factor which appears to have been overlooked and is arguably very relevant to what happens in Wrington. This is land use and treatment. It is suggested that the way in which the land within the catchment area is managed is a significant factor related to flood risk both in and around Wrington.

3.2.2 – Flooding from groundwater

Large scale maps show springs around Wrington. There are several to the east of the village boundary and even one or two within the village. It is suggested that the absence of damaging flooding this winter is related to capacity having been available under Wrington Hill and other higher ground to the north. It has been alleged that it is when the aquifers are full and the ground saturated that water erupts through springs on land to the east of Wrington, with this then unable to drain away. We recommend that further investigatory work is undertaken on the geology and soil structure both within the catchment area and on the ground to the north.

3.2.3 – Flood risk from Main Rivers and the Sea

The Yeo is a main river and obviously has an impact on drainage around Wrington and, specifically, on flooding at Beam Bridge, in Havyatt Road and in Mill Lane. These roads have suffered from major flooding both in recent weeks and on many occasions in the past.

3.2.4 – Flooding due to tide and fluvial 'locking'

We would argue that high water levels in Yeo to the south and west of Wrington cause 'locking'. In addition, even though there are two weirs on the Yeo between Wrington and Congresbury residents have reported a distinct tidal influence on drainage away from Wrington, which presumably relates to the very high volume of water in and on the surface of the land and the overall tidal effects.

3.2.5 – Flooding from sewerage systems

Escaping water from the sewerage system in Silver Street, Wrington, has certainly added to the flooding around the bridge over the stream. This has been evidenced by toilet paper seen in the flood water. Note also that the boiler room at the Memorial Hall in Silver Street has flooded regularly in the past, with the flood water tested by Wessex Water and found to be contaminated by sewage. As a result Wessex undertook works to protect the boiler room, including a one-way valve installed in the drainage system, although flooding has been experienced again this winter. It seems that the one-way valve wasn't functioning as intended, although Wessex promptly corrected the fault. The boiler room has since flooded again.

3.3.2 – New development

We agree that it is imperative that surface runoff and flood risk are fully assessed. This is essential and no new built development should be permitted unless it can be shown that there is no related increase in flood risk, whether on the development site or elsewhere.

3.3.3 – Asset deterioration

While the aim to develop a better understanding of the location, ownership and condition of assets which affect flood risk is appreciated, we suspect this could create a significant amount of work for Officers. This highlights the need for close cooperation with local communities through parish councils.

3.4.2 – Summary of most vulnerable communities

We have noted the factors associated with Wrington in Table 3-4 and suggest that the list is incomplete. The table indicates that Wrington experiences relate only to Fluvial and Highway flooding, whereas we would argue that significant flooding has been related to Surface run-off, Groundwater, Sewerage, Blockages and even Fluvial tide blocking, however unlikely the latter might appear. Please refer to the previous comments on these issues.

6.1.4 – Collate historic data from parish councils

While we are pleased to see parish councils' knowledge and experience recognised, please note the comment made below about the apparent failure to address information previously provided. This is also referred to in Table 6-1.

6.1.5 – Work with community resilience groups to raise awareness of flood risk

While this aim is supported and encouraged, the community resilience project is arguably embryonic and has probably not yet 'extended across North Somerset's administrative area', as suggested in Table 4-1. Our understanding is that community resilience is based on volunteer input and, in the circumstances, this should not be relied on as a readily available or essential resource.

6.1.13 – Improve linkages with development management services

We have noted the intention to work closely with development management with a view to ensuring that the impacts of development are minimised. We are particularly sensitive to this issue since it seems clear that poor planning decisions in the past have resulted in significant flood risk to property both on and off the most relevant development in Wrington. No development should be permitted in the future unless it can be guaranteed that there will be no increase in flood risk, with the developer required to provide directly related guarantees.

6.1.15 – Publish up to date surface water mapping

While this is essential, the results from some previous mapping have suggested that these maps might not accurately reflect what happens in practice. We recommend that there is local consultation before any further maps are published.

6.1.16 – Develop information brochure to raise awareness of flooding

While this is supported and welcomed, we suggest that preparation of the brochure should be prioritised for immediate action and not left until 2015, as shown on Table 6-1 and Fig 6-1.

6.2 – Action plan for measures in the most vulnerable communities

We have noted the action plan indicated for Wrington together with the related map included in Appendix A and the proposed measures. As suggested earlier, while we are very pleased that funding has now been secured for a flood relief scheme for the village we suggest that further discussion with the local community is needed on the detail and extent of flood risk in Wrington.

We feel that it would be helpful to refer to previous discussions and consultations with NSC and others, with this as follows.

Flooding in Wrington:

The Parish Council has in the past met with NSC, the Environment Agency and consultants to discuss flooding and flood risk in the parish. We have also submitted comments on relevant consultations. Unfortunately, it appears that much of the information provided has not been considered during the course of preparation of this Strategy.

For example, we responded to the following consultations and requests for information:

i. North Somerset Rivers Catchment Flood Management Plan, April 2003

Our response included 12 photographs (not digital), with the originals provided to Matt Boon, Environment Agency.

ii. North & Mid Somerset Catchment Flood Management Plan, November 2005

This built on our previous response and included comments on residents' personal experiences from July 1968, when Wrington suffered serious flooding which appears not to have been recorded elsewhere.

iii. NSC Strategic Flood Risk Assessment (SFRA)

In 2008 we met with Royal Haskoning and NSC at Somerset House to discuss flooding and flood risk in relation to their work on the SFRA. Note that comprehensive background information on local experiences of flooding was provided to Royal Haskoning, including a CD with 46 photographs illustrating flooding issues and locations.

iv. Wrington Drainage Study – Report produced by Sophie Jones for NSC, 2009

We met with Sophie Jones on several occasions during the course of her work to discuss and review drainage and flood risk in Wrington.

The point here is that it might be expected that this information should be readily available within NSC and, therefore, that any still relevant issues would have been addressed in the LFRMS.

Appendices:

Appendix A – Relevant legislation, regulation, plans and policies

Noted

Appendix B – Maps

There have been comments that the large file size created difficulties for several people who wanted to access this Appendix. Some other arrangement would have been more helpful.

Appendix C – Working together to deliver local flood risk management

Although it might be presumed that landowners are included under 'local businesses' the potential value of local knowledge and experience cannot be underestimated. The role of landowners, householders, especially riparian owners, and local councils is potentially crucial and needs to be highlighted.

Appendix D – Potential funding sources

Noted

Appendix E – Summary of action plans

Again, there have been comments about the large file size. However, as explained elsewhere, the detail provided on the Wrington plan does not fully reflect the flooding experienced here in the past.

F – Glossary

The Glossary is helpful although we recommend that it is checked for inconsistencies before the LFRMS is published.

References:

There are a number of references in the document which appear to have been omitted. While references 1 to 8 are clear (up to the foot of page 8), the subsequent references aren't obvious, or at least not that we've been able to access

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