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Old Windsor Parish Council Response to Flood Risk Reduction Letter

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Old Windsor Parish Council – Formed in 1894

This response is made to the Royal Borough of Windsor & Maidenhead (RBWM) request for alternative proposals to the specific parts covering the Royal Borough section of the River Thames Scheme.

Old Windsor Parish Council (OWPC) believe the consultation exercise RBWM have called for is unnecessary and flawed based on there being no viable alternatives to that selected in the Environment Agency's (EA) Lower Thames Flood Risk Management Strategy - Strategy Approval Report (StAR) (ref.: IMTH000913) of August 2010; the so-called Approach D2. The scheme consisted of a number of measures such as Flood Plain Management (FPM), downstream works and which for the 'Reach 3' area (Datchet to Walton Bridge) section required the construction of three river diversion channels to be delivered; the channel covering the RBWM area of interest to OWPC being channel 1 starting at Datchet and ending at Runnymede.

The paper presented before Council entitled 'To update the Infrastructure Overview and Scrutiny Panel on partnership funding for the River Thames Scheme' of the 30th October 2020 summarised clearly that the scheme was still needed though not funded. This approved strategy, that RBWM committed to in 2017, set budget for sequential year on year funding to a total of £52.7M with a current balance remaining of £41.275M which has been deemed unaffordable. As a result, this paper highlighted that RBWM had not been able to commit to the EA in July 2020 and so channel 1 was dropped from the scheme. However, the paper did not highlight that there are no alternatives to the original 2010 scheme that would constitute a viable scheme locally, stating "The River Thames Scheme is the optimum solution to reduce flood risk and deliver broader benefits in this area of the Royal Borough."

Returning to the EA StAR provides adequate evidence that the option selected (approach D2) is the best and only measure that will provide protection to our residents and collectively Reach 3 and 4 residents. It is likely, in response to your request, a number of measures will be proposed similar to the options rejected at the preliminary stages, these are:

- Section 4.3.2; 4.3.3 & 4.3.5 (pp22) – river bed reprofiling or dredging was dismissed on the basis of the high environmental damage to aquatic species that would occur and the poorer economic performance and as noted in the executive summary of the StAR has been proven that in the absence of dredging over the last ten years (at the time of writing in 2010) that it made little difference to the prevalence of flooding further down the Thames. Alternative channel routes were dismissed as "the preferred alignment for each was chosen to reduce impacts on high quality environments, designated sites, heritage sites and existing assets, and to minimise risks for private property and known landfill sites". Further upstream mitigation measures were ruled out as being unrealistically large needing an area of "200km² of land in Oxfordshire" to be set aside to flood; this is beyond the control of RBWM to enact.
- Section 4.4.6 (pp.23) – A preliminary option which was dismissed described as intervention approach D4; which consisted of FPM, some 'downstream' works and with channels 2 and 3 only (removing 1 from the scheme as now proposed by RBWMs inability to commit in July 2020). It was rejected as it "would only offer flood risk improvements to people in the Staines to Shepperton area. Datchet, Old Windsor, Wraysbury and Hythe End, with approximately 20% of the Reach 3 flood risk, would benefit little." the rejection of this approach was further justified stating "it is highly unlikely that the D4 approach would be considered an acceptable solution at Public Inquiry." For these reasons OWPC do not support passive low-cost FPM based approaches as they will provide little flood risk reduction and therefore no benefit to our residents and furthermore pass the problem downstream to Staines, Shepperton and beyond into Reach 4. The entire scheme is summarised in the StAR as needing to be considered not as two separate 'reaches' but as one flood cell; failure to deliver one part directly impacts another.
- Section 5.3.1 (pp.29) – The social and community impacts are the starkest reading of the StAR and the selected is justified by "Approach D2 offers the greatest social benefits of all approaches, providing significant reductions in flood risk to the majority of properties in Reach 3 (between Datchet and Shepperton) and improving flood management overall. Flood risk would reduce for around 15,000 properties in Reach 3 (25,000 or more allowing for future climate change impacts) and over 35,000 people." Since this time the EA have revised their future climate change impacts estimates, now it is suggested many thousands more people are at risk of flooding as a result. As areas dominated by the RBWM section of the Thames represent around 20% of the total flood risk of Reach 3, it is considered the residents at risk are a significant proportion of this number.

- Section 5.5.23 (pp.38) – The approach D2 selected suggests that implementing the diversion channels in Reach 3 would provide the benefit of removing 90% of the 5,280 properties at very significant flood risk to a lower band and those with a significant risk reduced from 10,670 to around 2,780. Both sets of numbers are likely to have increased with revisions to future climate change impacts modelling in the last ten years and highlight that as this stretch of the River Thames is capable of a flow of 150m³/sec diversion channels seek only to relieve pressure on main river flow. None of the other approaches can offer these levels of reduction in flood risk, with the very highest risk band likely to translate in a worst-case scenario to loss of life.
- Section 6.1.9 (pp.41) – The economic case for approach D2 is justified as it “is the preferred economically qualifying option, taking into account the two flood cells as a whole and the high consequences of flooding throughout Reach 3 in particular.” It is clear from this document that the spend on this scheme is needed at some point in the future regardless of the current RBWM self-inflicted economic crisis.

It is worth reminding RBWM that their recent Environment Strategy contained a goal on natural environment (Implement a New Natural Capital programme to deliver 10% biodiversity net gain) which itself does not link to an evidence based policy from the Green and Blue Infrastructure Strategy which would be supported by the River Thames Scheme. This scheme would deliver a huge contribution to this by allowing the current National Planning Policy Framework (NPPF) considerations of supplementary planning guidance on ‘Biodiversity Net Gain’ to be realised along the corridor of the diversion channel.

Though the paper to the Infrastructure Overview and Scrutiny Panel in October 2020 suggested that a change in legislation, to apply a flood levy over and above core Council Tax, is considered the only viable route to secure funding, OWPC suggests there are 2 alternative options

- 1) That RBWM could lobby their colleagues in HM Treasury, The Planning Inspectorate and Defra to consider funding this channel as a Nationally Significant Infrastructure Project (NSIP) and vital to the delivery of the whole Lower Thames Flood Risk Management Strategy.
- 2) Emulate our neighbouring council, Surrey, and borrow to fund the scheme.

In summary, OWPC strongly supports the findings of and believes that there are no alternatives to the 2010 EA StAR proposals that would deliver anything like the essential protection from flooding our residents need and were promised by RBWM that they would receive. By not committing capital spend to this project RBWM are putting the entire scheme at risk as highlighted by looking at the alternatives, all of which were rejected. Failure to deliver this scheme means that residents remain at risk and certainly don’t enjoy the protection already afforded to Windsor and Maidenhead. OWPC will robustly challenge RBWM to ensure that any proposals brought forward for consideration offer; as a minimum, the benefits of protection for our residents as outlined in the 2010 EA StAR scheme.