

To: Mr Mark Ogden, Flood and Water Management Department, Norfolk County Council

Cc: County Councillor Martin Wilby, Chairman of the Environment Development and Transport Committee
County Councillor Claire Bowes

From: Watton Town Council

Date: 14 February 2018

Re: Draft Flood Investigation Report: Flooding in Watton and surrounding area on 23 June 2016

The Council appreciates the opportunity to comment on the report about the flooding in Watton and surrounding area on 23 June 2016 even if it is 18 months after that disastrous event for the town.

The Town Council is commenting on those sections of the report that concern Watton as they expect that other parishes like Saham Toney will be making their own response.

Our comments are listed below in numbered paragraphs for ease of reference.

Surface Water Management Plans

1. The Council notes on page 62 that *“This report has been prepared as part of Norfolk County Council’s responsibilities under the Flood and Water Management Act 2010. It is intended to provide context and information to support the delivery of the local flood risk management strategy and should not be used for any other purpose.”*
2. A report to the County’s Environment, Development and Transport Committee on 10 July 2015 presented the final draft of the Local Flood Risk Management Strategy for Norfolk. This was adopted at the Full Council Meeting of 25 July 2015.
3. The Town Council is aware that King’s Lynn and West Norfolk settlements, North Norfolk, Great Yarmouth Borough, Norwich Urban area and South Norfolk now all have Local Flood Risk Management Strategies.
4. It seems that Breckland has none as yet. The 10 July report seems to suggest some reasons why:

11.5 The dispersed population centres, undulating topography and multiple river sub-catchments means that surface water drainage in the district is complex, with most flood risk issues effecting only relatively small areas.

11.10 Breckland’s Strategic Flood Risk Assessments of 2005, 2007 and 2009 and the Environment Agency’s Flood Maps provide an indication of the extent of flood

risk associated with the main rivers. Breckland's Strategic Flood Risk Assessments also identified a number of surface water and sewer flooding events across the district.

11.11 Although the risk of fluvial flooding is relatively limited, compared to the level of risk in other Norfolk Districts, some of the major urban areas in Breckland do face significant local flood risk.

11.13 A Surface Water Management Plan has not yet been undertaken for any of Breckland's settlements and reliable information on surface water flooding is diffuse.

11.18 Following significant rainfall in 2012 there have been some instances of flooding associated with high groundwater levels. However, at this time there is limited understanding of the risk of groundwater flooding in the district.

11.19 Further work is necessary to understand the full extent of risk from surface water flooding in Breckland, including the preparation of Surface Water Management Plans.

11.23 Relative to other Norfolk Districts, Breckland has lower levels of fluvial flood risk, affecting fewer properties. Where flooding affects only a limited number of properties, it is unlikely that measures to improve flood defences will attract priority funding. Instead it may be necessary to place greater reliance on making properties that are at risk more resilient to flooding.

5. So the Town Council concludes that the County Council has given up on providing a Surface Water Management Plan for Breckland because of the complexity of the surface water drainage, because reliable information on surface water flooding is diffuse and because of an anticipated lack of funding for the work that would help to protect the town. The Town Council would like the possibility of such a Plan for Watton revisited.

6. Quotes from the County website explain about Surface Water Management Plans:

Surface water flooding happens when the ground, rivers and drains cannot absorb heavy rainfall.

Typically this type of flooding is localised and happens very quickly after the rain has fallen, making it difficult to give any flood warning. It is therefore important to identify areas where measures need to be taken to protect properties and critical infrastructure from surface water flooding.

Surface water flooding is a general term which is used to cover flooding from:

- *Runoff of rainwater from impermeable surfaces, such as roofs, roads, driveways, patios and car parks*

- *Groundwater in areas where water has percolated into the soil on high ground and then emerges in lower areas*
- *Flooding from small streams, drainage ditches, drains or sewers*

As Lead Local Flood Authority, Norfolk County Council is responsible for looking at the causes of surface water flooding and its consequences, in order to learn lessons and help predict potential future flooding and minimise its effects.

We do this through our Surface Water Management Plans (SWMP) which utilise historical flood records and detailed models of potential future floods.

SWMPs are used to help identify areas that are at risk from surface water flooding during heavy rainfall events; these areas will be prioritised for further detailed study and work.

This work can involve a number of solutions, ranging from engineering work to reduce the risk of flooding to advising residents and businesses how to protect their properties from flooding.

- 7 The Town Council think that Watton needs to be prioritised for further detailed work to see if any works at the engineering end of the spectrum will protect the town from future flooding. With the help of the Watton Action Group – Drainage, they are in the process of researching the full past history of flooding in Watton and will produce a report for the County, Breckland and Anglian Water when all the relevant facts are known. One fact known as of now is that there was serious flooding on 15 June 2009.
8. The Town Council welcomes the following statements in the Flood Investigation Report:

Page 5: Breckland District Council should review their approach to the use of their permissive to maintain watercourses powers under the Land Drainage Act 1991.

What plans do NCC have to review watercourses / ditches to ensure they are clear and not filled in under this Act?

Page 5: Anglian Water should work with partner organisations to identify the potential for managing the amounts of surface water entering their drainage system in flood events.

The Town Council regards this as particularly important as they understand that the majority of sewers in the town are combined sewers and as the report indicates there have been a number of examples of sewer surcharging at various points across the town.

Matters of concern raised by the report

9. The Council understood that, at the meeting and walk about on 15 August 2016 which Graham Brown attended for the County, Martin Pendlebury for Breckland and Jonathan Glerum for Anglian Water, the Council had registered with all the agencies the internal flooding at Canon Close, Priory Road and Vicarage Walk as well as those that appear in your report.
10. At no time, was the Council advised that individual residents were required to register the flooding with either the County or Breckland in order for their property to be considered. If that had been known, the Council would have encouraged and supported residents in doing this.
11. So, the outcome is that only those residents who managed to log the flooding of their property to the County or Breckland via email or on-line report or personal communication, along with those reported by the Fire Service, appear on your report.
12. While not wanting to prevent the identified residents from receiving support to protect their homes from flash flooding, the Council regards the basis of the selection as unfair and discriminatory. In addition, only 46 of the 101 properties in Watton have been visited and their flooding confirmed and only they are to be in receipt of possible funding to protect their property.
 - Property Owners – What expertise do the average property owners have to confirm the integrity of the drainage capacity of their property?
 - All property owners should remove any inappropriate surface water connections to the foul sewer system – How do they achieve this when the builders have plumbed this in?
13. Page 10 – **Flood incidents within this catchment**
 - The table mentions advice given to affected residents by NCC, The Fire and Rescue Service and an investigation by Anglian Water – What advice was given and was this followed up by the authorities with a follow up visit to the affected properties?
14. The Council has no indication of the basis of the sample apart from internal flooding as was the case with the whole sample. So there is no sense that it is in any way a representative sample.

Other points in the report that require further explanation:

15. The first bullet point on page 4 states that the rainfall experienced on 23 June 2016 was recorded east of Watton as being a 1 in 46 year event. This bullet point also states that it is likely that localised areas of the catchment saw a much greater rainfall event and refers to mapping of 1 in 100 years and 1 in 1000 years flood extent. The Council would like to understand what these figures mean.
16. Page 11 – **Recent rainfall within the catchment**
 - There are no rain gauges within 2.5km of the incidents – What point is 2.5km taken from?
17. The rain gauge used is described as east of Watton and the Council would like to know where it is located because of where it has been used ie the Hembeck, Watton Centre, Merton and King Row catchments but not South Moor or Watton Green catchments which are further east.
18. As a point of information, the Council has access to the records of an amateur weather buff in the centre of Watton and they are working with him on producing evidence of correlations between heavy rainfall and flooding for past years including 2009 as well as for 2016 and 2017.
19. Page 34 – **Flood incidents within this catchment**
 - Mentions a report by a resident on Threxton Road Industrial Estate – No mention of the two companies Exheat and Cranswick Foods who were also flooded – why was this not investigated?
20. Cranswick in particular is vital to the town as it employs 1200 people. In 2009, the flooding was so deep that a lorry driver had to be rescued from his cab by boat (information from their Health and Safety Manager).

What needs to be in place from now

21. The summer months are when the greatest rainfall falls in a short period, and as it is unlikely that any of the measures desired by the Town Council or proposed in the Flood Investigation Report are likely to be in place by the summer of 2018, the Town Council would like robust procedures in place as to who is informed about any flash flooding that occurs and how, so that both residents and the Town Council know what to do.
22. The Town Council also considers that **all** residents at risk of flooding should have access to appropriate advice. They understand that the Environment Agency has produced such a leaflet and that it should be made available to such residents. At the very least, a supply of sandbags or other suitable temporary protection should be made available.

23. The Town Council is copying this report to County Councillor Martin Wilby as he is the Chairman of the Environment Development and Transport Committee (EDT) to whom the Flood and Water Management team are accountable and as he also took part in the meeting and walk about on 15 August 2016.
24. The Town Council understands that there is a sub-committee of the EDT with the following Terms of Reference:

1.1. To form a single cross-party member working group with the following Terms of Reference:

- develop more in-depth knowledge of the issues and opportunities surrounding the management of flooding and coastal erosion in Norfolk;*
- monitor the delivery of the Local Flood Risk Management Strategy and Shoreline Management Plans;*
- monitor the delivery of partnership projects to secure flood and coastal erosion management schemes across the area;*
- oversee the administration and recommendations of any flood and coastal erosion grants at the disposal of Norfolk County Council.*

This group will be advisory with quarterly meetings and will report back to this Committee.

25. The Town Council would like Mr Wilby to consider asking this member working group to monitor the Flood Investigation Report for Watton and the surrounding area and to let them see a copy of this response by the Town Council.

Report Author: Liz Whitcher on behalf of Watton Action Group – Drainage, a Working Group of Watton Neighbourhood Plan