River Roding Strategy Consultation Environment Agency Swift House Frimley Business Park GU16 7SQ

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Dear Sir or Madam

River Roding Strategy Consultation – formal response from Epping Forest District Council

I refer to the letter from Ben Meuli dated 20th September 2011 with regard to additional time required to submit our formal response, as agreed with the Environment Agency (EA). Please accept this letter as our formal response to your River Roding Strategy Consultation.

Firstly, I would like to thank you for accepting our formal response after the closing date of the consultation of 26th September 2011. I would also like to thank your staff who met with our officers on three occasions, including attending the Planning Services Scrutiny Standing Panel, and provided us with more detailed information than was available in the consultation documents.

Epping Forest District Council (EFDC) understands the financial constraints being placed upon the EA and the need for realistic, sustainable flood risk management. However, having reviewed the available information and the potential impacts of the strategy, EFDC wishes to formally state its objection to the proposed strategy.

Our objection relates to the proposed changes to the river maintenance regime (the cessation of all maintenance activities) and the local impacts of the proposed Shonks Mill flood storage area as we believe these will have a detrimental effect on residents and land within Epping Forest district. However we understand and support the need for a flood storage area in the upper catchment of the Roding.

Our objection is based on the following principle reasons:

- 1. Flood risk will increase at certain properties and open land within the District;
- 2. There will be a greater duty on riparian owners to maintain the river at their cost, than is currently the case;
- 3. The impacts on ordinary watercourses are not known and there may be an increase in flood risk related to ordinary watercourses; and
- 4. There may be financial and staffing implications for EFDC in the future, such as increased inspections and emergency response and riparian ownership responsibilities.

Should the proposals go ahead then EFDC would want to see the following:

1. A review of the strategy within five years, or sooner if needed given real flooding events, to ensure the predicted effects are as expected and if any flooding has occurred it matches the

modelled predictions. Should the outcomes of the proposed strategy not be as the EA has predicted and the flood risk is greater than anticipated then the EA should look to restore an appropriate river maintenance regime.

- 2. That the EA works with the affected properties and riparian owners as far as practicable to help them adapt to the new situation. We understand this cannot be direct financial assistance from the EA but the EA can assist with preparing funding applications.
- 3. That the EA works with EFDC as riparian owner of a large stretch of the river and utilises the local knowledge and assistance that EFDC can provide over the district as a whole.

I trust that you understand our objection to the strategy and understand that we do not wish to jeopardise the close working relationship that has been built up over many years between EFDC officers and EA staff.

Yours faithfully,

John Gilbert Director of Environment and Street Scene