

RBWM PRE-CABINET MEETING
30TH OCTOBER, 2014
ANSWERS TO RESIDENT REQUESTED ACTIONS

Red RBWM
Blue TW
Green EA

Comment and requests for further information.

1. Flood/Storm Discharge Protocol:

Due to the confusion between authorities and failure of TW/EA to act throughout flood, the need for a procedure was agreed in April. The procedure was partially put into practice on 10th July following short duration ammonia discharge.

Actions:

- a. RBWM to publish fully documented protocol, including response targets, by end November.

Yes, RBWM is finalising a draft working procedure to encapsulate roles, responsibilities and actions for the key agencies/organisations relating to significant discharges and or storm discharge from Slough Treatment Works. This intention is for this document to act as a service level agreement agreed between the parties that includes response timescales etc. Once the document is signed off by all parties it can be published.

- b. *RBWM to confirm resident legal redress should procedure/targets not be achieved.*

The working procedure itself will not be a legal document with legally binding obligations. However, residents can register formal complaints against the council, the Environment Agency and Thames Water if they are not satisfied with their actions. Residents can also refer a case to the relevant Government Ombudsman if they feel that the Council or the Environment Agency have not done something properly or have not done something that it has a duty to do (maladministration). Residents can register formal complaints in respect of Thames Water with the Consumer Council for Water

- c. *RBWM to ensure procedure details designated authority responsible for collection/disposal of animal carcasses and clean up standards/response times following major event*

A specific section will be included on this matter for clean up that is attributable to a significant discharge and or storm discharge.

- d. *RBWM to become single point of contact, creating and publicising hotline and webpage for residents' questions and concerns in event of storm discharges.*

The council is willing to act as a single point of contact for resident's questions and queries in relation to storm discharges and will seek to gain responses from relevant organisations/authorities in this regard. The contact point for this purpose should be environmental.protection@rbwm.gov.uk or contact the Customer Contact Centre on (01628) 683800. However, an important distinction must be drawn in that any resident wishing to report a potential pollution incident must use the Environment Agency hotline – 0800 80 70 60 (24 hours a day) so that the incident is logged and the response by the relevant authority is in no way delayed.

2. Storm discharge data/legality:

Specific data in relation to last five years storm outflow events/volumes from Slough STW was formally requested prior to and during April's Public Meeting. TW/EA presented and 'spun' other data to support legality of TW discharge. RBWM minutes detail EA as investigating legality, but their statement recorded at the meeting confirmed discharge was legal. EA ultimately agreed to provide data as a meeting action.

On 17th July TW confirmed the data was unavailable as they do not monitor storm discharge and volumetric meters recording flow into works and effluent discharge failed on 9th December and 28th January respectively.

Despite EA supporting discharge as legal, the EA advised they were made aware in February but only issued an enforcement notice on 18th July for meters to be in place by end August.

Actions:

- a. *EA to explain why they waited until 18th July to issue flow meter enforcement notice if TW reported failure in February.*

Flow monitoring and recording is a condition of the sites Environmental Permit. The permit requires the site to treat a certain amount of flow before it can be diverted to the storm tanks (storm flow). This flow into the works is measured at the inlet to the works. When the site does divert to storm, these flow recordings would enable the Environment Agency to assess the compliance any storm discharge.

An Environment Officer visited the STW to undertake an inspection of the works in January. During this inspection the Environment Agency officer recorded the breach of permit and advised Thames Water this needed to be fixed. The meters that needed to be installed are MAG-type flow meters. These are very large meters and would require a complete diversion of the inlet flow to the works. This means the best time to do this (while minimising risk to the environment) would be in the evening during spring/summer when flows are lower. Thames Water ordered the meter and it was delivered to site at the end of April. The time line for fitting was agreed but then delayed by Thames Water on 2 occasions. After the second delay the Environment Agency served a notice on Thames Water requiring them to install the meters by the end of August, or face prosecution.

The enforcement notice could be challenged if there was not enough time to act, so we needed to set a reasonable response time. Thames Water eventually installed the meters in August 2014.

At the April meeting the EA confirmed the TW storm effluent discharge/flooding from 3rd December to 19th March was legitimate. The discharge licence issued in 1998 required TW to record data of storm effluent volumes discharged into Roundmoor with annual data submission to the EA. We requested this data in February but were unable to obtain. At the April meeting TW/AE presented detailed flows into the treatment works but continually avoided our questions and requests for correct storm records. Those of you who attended the meeting will remember our insistence on access to these records. The action was formally recorded and the EA agreed to provide contact details for the relevant contact. Despite further requests the EA would not provide contact or records.

Following the ammonia discharge on 9/7, TW issued a communication on 17/7 advising the emission was due to contractor error. Within the communication TW confirmed volumetric meters were fitted at Slough STW on the flow into works and discharge from works. Both failed on 9th December and 28th January respectively. They also confirmed a meter had never been fitted on the storm flow into Roundmoor. Without this data the EA could not classify the four month discharge as legitimate and TW would have breached permit.

We immediately questioned the EA. They replied on 24/7 stating TW informed them in February that flow meters were flood damaged. The EA served an enforcement notice on 17/7 requiring TW to install working meters by 31st August. The EA excused their omission by stating they could not admit as information was not in the public domain.

The EA are now admitting the permit breach was formally recorded in January. Without storm flow data the EA could not classify the four month effluent discharge as legitimate.

We have asked RBWM to investigate further.

- b. *TW to confirm volumetric meters have now been installed on flow into Slough STW, effluent outflow and storm discharge route.*

Flow meter installations for influent, effluent and storm discharges were completed on 29th August 2014. This was confirmed in writing to the EA on the same date and effluent data has been supplied to the EA to prove the meters are fully functional.

- c. *TW to confirm data will be recorded daily, formally published with daily flow data issued to/accessible to residents.*

The data from the flow meters is recorded and monthly downloads of the data are sent to the EA. We do not currently publish flow data for public consumption but would always be willing to make this available for specific periods on request.

- d. *EA to explain why they did not check provision/condition of flow meters at Slough STW or collate data from TW as clearly defined and stipulated in the EA Licence issued to TW.*

The Environment Agency has carried out regular inspections of the site. During an inspection of the site in January 2014 an Environment Agency Officer identified and reported a breach of licence in relation to flow monitoring. This is highlighted in the Environment Agency Compliance Assessment Report (CAR) form dated 23 January 2014.

As well as on site inspections we regulate water companies in a number of different ways. These include Operator Self Monitoring (OSM) samples of discharge water quality, data checks, inspections and audits. On most sites storm flow meters are unusual, most focus is on final effluent flow which has to be MCERTS, this is the Environment Agency's certification standard. This means that the data provided will be considered to be an acceptable standard. This data is checked annually to ensure that flow is still being measured consistently and accurately. Flow is also going to be part of water company OMA audit (Operator Monitoring Assessment) this is the audit the Environment Agency undertakes to review water companies self monitoring procedures. At present this covers their sampling programme, however from next year it will also include meters. Site inspections of compliance with the Environmental Permit are undertaken on a regular basis, but tend to be more frequent for larger sites.

We have asked RBWM to request a copy of the above report. This is an ideal opportunity to set a reporting structure in place ensuring EA/TW monitor and provide access to the flow meter readings plus report on site inspections to ensure compliance. It seems they do not count Slough STW as a large site requiring frequent inspection but could be made a requirement based on concerns regarding capacity/flow and significance of discharge route, with reporting at flood forum.

- e. *RBWM to investigate how EA classified December-March discharges as legal in April without access to the required flow data*

RBWM will ask the EA to provide an explanation to residents on this matter. RBWM suggest that this would be a matter that could be investigated as a formal complaint in line with the Environment Agency formal complaint procedure if residents are not satisfied with the response. Residents would in turn have access to the Parliamentary and Health Service Ombudsman via their local MP.

The Environment Agency is currently carrying out an investigation into the legality of the storm discharges between December and March. This is an active investigation and we have not reached a conclusion regarding the legality of the Storm discharges.

It is clear the EA are covering up failure and are using 'active investigation' to postpone release of information and results. As long as research stays active they can hide. Nine months on the investigation should now be complete. We have asked to RBWM formally request report conclusions before meeting or set target for official report.

- f. *RBWM to advise legal position and proposed action to prosecute the EA for failure to monitor and enforce Licence.*

RBWM has no legal jurisdiction over the Environment Agency and as above suggest that this would be a matter that could be investigated as a formal complaint in line with the Environment Agency formal complaint procedure. Residents would in turn have access to the Parliamentary and Health Service Ombudsman via their local MP if they were unsatisfied with the outcome of the investigation.

- g. *EA to share results of investigation into TW storm event and elevated ammonia discharge including assessment of TW's permit compliance as detailed in notice dated 24th July.*

We are continuing to investigate the storming incidents. As this is an active investigation we are unable to expand or share information that may be used as part an enforcement response. As soon as we conclude our investigation the Environment Agency will be able to share all information regarding this incident.

On 10 July 2014 Thames Water notified the Environment Agency of an incident of elevated ammonia discharged from the Sewage Treatment Works (STW) at Slough. Environment Agency officers made a site visit to Slough STW on 10 July 2014 to inspect and assess the environmental impact on the watercourse. No other issues with the STW were identified. This incident was unrelated to the storm sewage incident at Slough STW during the 2013/14 winter floods.

We have monitored the quality of the water in the Roundmoor Ditch. Our monitoring results highlighted that ammonia levels were higher during the night. This indicated that the STW was not treating ammonia to the standard we would expect. It was above the lower tier limit but below the upper tier limit, so was not a permit breach. We raised this with the process manager after inspecting the site. Thames Water carried out an investigation and found there was an issue with their aeration lanes. Work has been carried out on these lanes. We monitored progress and liaised with Thames Water to ensure work was completed in a timely manner.

Our regulation has resulted in the sites ammonia output regularly being under 2 mg/l, which is 1 mg/l under their lower tier limit. This has had a positive effect on the quality of the Roundmoor ditch.

We have requested RBWM obtain data to check limit statement, duration TW have been discharging and date corrected.

Interestingly, TW and the EA blamed high ammonia levels throughout summer on the Dorney Common flooding issues/drainage of pooled water back into stream having been contaminated by cattle waste. Throughout TW/EA were at a loss to understand high levels; they initially placed aeration equipment on Common following the long term discharge on 10/7 but allowed to remain at great cost as a gesture of goodwill towards Commoners/residents. It seems we have uncovered the real reason for high ammonia/low dissolved oxygen.

3. Re-routing of storm discharge:

On the 17th July TW advised a meeting had been held with the EA on 29th May to discuss relocation of storm discharge point from Slough STW. TW commented:

“the options were discussed in some detail and the EA took an action to contact their Flood Defence team to see if the Jubilee River option was even a possibility. We also discussed the matter at our regular Permitting Liaison Meetings on the 3rd July where the same EA team were again present along with our normal contacts at the National Permitting Centre. It was not discussed in depth here but there was a commitment to chase the feedback from within the EA. Here are the notes from the relevant Thames Water team member:

We discussed two options – firstly, a permanent change to the storm discharge location, which would require a change to the discharge permit and then as an alternative, we discussed the possibility of having an agreement in place that would allow pumping of the Roundmoor Ditch to the Jubilee River in extreme circumstances (as we

experienced this winter). We mentioned the latter as an option, in case a permanent relocation is deemed not appropriate due to lack of dilution in the Jubilee River in less extreme weather events.

There were a couple of issues that the Agency had some concern over. Firstly they wanted to consult with their FRCM (flood risk & coastal management team) to ascertain whether in very high flow conditions, the Jubilee River can hydraulically accept additional flows without causing flooding further downstream. We haven't heard back on this yet (despite chasing them). Obviously this could be a complete show-stopper if they say there is no capacity in the Jubilee.

Secondly, to support any application the EA have said that they will expect a full network investigation and infiltration study due to the extreme spills that were seen from the site. This will be along the lines of looking at any options for removing any infiltration or inundation from the network, over pumping in the network in an emergency (to reduce the storm spill at Slough itself) etc.

Checked with our asset planning team, and what the EA are asking for in terms of an infiltration study is quite difficult to do – as you will appreciate, this is a bit like trying to find a needle in a haystack and if there are high flows due to groundwater infiltration, we can only find them when the groundwater levels are high – which is also the time when it is dangerous to enter sewers to try to put flow monitoring loggers in. We are continuing to work on the process and prioritisation for these studies across the whole of the Thames Water area, so this is not a quick fix I'm afraid.

On 29th July the EA issued a formal statement (which they would not distribute to residents) stating their Asset Performance Team deemed the Jubilee River option 'not appropriate'. On 1st October the EA commented if they were to allow storm discharges from the Slough STW to enter the Jubilee river they would need to reduce flows down the river from the Thames; this is not something they could or would do. There are no other discharges into the Jubilee River for the same reason.

A simple statement deeming solution of re-routing into Jubilee River 'not appropriate' is unacceptable.

Actions:

- a. *TW to publish Slough STW plant information including process volumes, capacity for future increases, capacity of storage tanks from empty, frequency storm effluent directed to tanks, volumes stored and duration, frequency of discharge, frequency single storm has resulted in peak capacity and storm discharge, anticipated future discharge volumes/frequency.*

Most of this information is in the site's SOM (Site Operating Manual) or could be produced from our technical and operational records. But there is a lot of work involved and we would need to understand what is needed and for what purpose to make sure it is presented in an accessible fashion. I suggest we set up a meeting to discuss.

- b. *TW to explain comment pertaining to the pumping of storm discharge from Roundmoor Ditch into the Jubilee River as an option, if permanent relocation is deemed not appropriate due to lack of dilution in less extreme weather events. If the Jubilee can achieve suitable dilution of high level storm effluent in extreme weather events, it can achieve acceptable dilution from reduced effluent levels in less extreme weather events. In either event the dilution far exceeds that of Roundmoor and Boveney Ditches.*

Having viewed the STW outfall, its proximity to the Jubilee etc, there is no doubt that it would be physically quite straightforward (although expensive) to relocate storm discharges (and final effluent) into the Jubilee. The effluent is currently piped under the Jubilee and resurfaces in a chamber the other side of the river at Roundmoor Ditch so logistically it is not difficult. However we have not explored this beyond initial conversations with the EA as it would require their approval and they have not (yet) given any indication that they would be willing to support the change.

- c. *EA to report in detail on consultation with their Flood Risk and Coastal Management Team regarding the Jubilee Rivers ability to hydraulically accept additional flows.*

The Jubilee River is a flood relief channel and has a design capacity of 180 cumecs. Flows into the Jubilee River are controlled at Taplow Weir. Any additional flows into the channel would reduce the amount of water that can be diverted into the Jubilee River when water levels in the River Thames are high. Any additional flows into the channel would reduce the current standard of flood protection to Maidenhead, Windsor and Eton and so diverting storm discharges would not be acceptable.

We have requested a detailed response via RBWM.

- d. *EA to explain how they expect TW to carry out a full network inspection and infiltration study when TW are only able to locate when ground water levels are high and sewers are dangerous to enter, without this being viewed as an EA delaying tactic.*

Infiltration into Thames waters Sewage network is an issue that affects the entire sewage network, and is not isolated to one area. Thames Water has already carried out a number of infiltration studies and have shared these with the Environment Agency. Thames Water has used a range of methodologies to complete these studies with varied results. Thames water is best placed to inform people in the Eton Wick area how they plan to undertake these studies.

On 17/7 Helen Newman TW emailed ... to support any application the EA have said that they will expect a full network investigation and infiltration study due to the extreme spills that were seen from the site. This will be along the lines of looking at any options for removing any infiltration or inundation from the network, over pumping in the network in an emergency (to reduce the storm spill at Slough itself) etc.

I checked with our asset planning team, and what the EA are asking for in terms of an infiltration study is quite difficult to do – as you will appreciate, this is a bit like trying to find a needle in a haystack and if there are high flows due to groundwater infiltration, we can only find them when the groundwater levels are high – which is also the time when it is dangerous to enter sewers to try to put flow monitoring loggers in. We are continuing to work on the process and prioritisation for these studies across the whole of the Thames Water area, so this is not a quick fix I'm afraid.

We have requested RBWM ask TW to share results of the infiltration studies and their effect on STW capacity/storm flows. This info is critical to both TW/EA's argument for and against alternative discharge route.

- e. *EA to explain why their Asset Performance Team were only mentioned after the Public Meeting in April concluded, including the overhead comment "it would doubtful pass their scrutiny"*

Please could residences provide more information on what this is referring to, this will enable the Environment Agency to provide a full response to this question.

The EA's answer is not the reason for this question.

At the April meeting residents argued for the Jubilee River discharge route to be formally investigated. The action was agreed by all parties and residents felt the meeting had a positive outcome.

The EA had ample opportunity to involve the Asset Performance Team in the public meeting or at least mention their role within EA decision making. However, at the end of the meeting the EA representatives were talking amongst their group and were overhead discussing how the proposal would never get past the APT.

The reason for this question was to highlight the EA simply paid lip service to the proposal. EA representatives already knew the Asset Performance Team would never consider this option.

This raises awareness of EA tactics.

- f. *EA/TW to publish detailed investigation data, flow assessments and risk assessments to support refusal.*

This is not currently available as investigations have not progressed to the point of detailed data, flow assessments and risk assessments following the EA's initial view that they did not consider this an appropriate solution.

Please refer to our response to action 3C.

The decision has been made on the principle that the capacity of the channel cannot be reduced without increasing flood risk to Maidenhead, Windsor and Eton, we do not plan to carry out any further investigation.

However, we are happy to investigate an alternative proposals put forward by Thames Water.

RBWM are requesting detailed support data for decision.

- g. *EA/TW to publish risk and flow assessments that deem discharge into Roundmoor, through a village, more appropriate*

We do not have risk assessment and flow assessments for this. Our discharge permit allows discharge at the current location into the Roundmoor Ditch and this is how we've operated the site for many years.

The volume and quality of effluent was assessed when the sewage treatment work discharge permit would have been issued. The permit is reviewed on a regular basis. The onus is on Thames Water to demonstrate the impact on the surrounding environment and how that can be mitigated.

The Environment Agency assesses the impact and mitigation proposed and ensures that there is no measurable impact on the environment. It is not uncommon for Sewage Treatment Work to discharge in time of storm, especially during adverse weather condition, like in the last winter's flooding.

There have been 2 instances of sewage being reported in the Roundmoor ditch in the last 5 years (in addition to the last winter's event).

The sewage discharge permit was issued in 1998. Capacity/flow and regulations have changed within that time.

If the EA issue a licence they are responsible for monitoring and enforcing licence and specific content. We know they have not monitored as TW are expected to submit annual returns detailing flows into Roundmoor and content, impossible to achieve when flow meter never fitted to storm outflow. It cannot be TW's responsibility to demonstrate impact on surrounding environment.

To say there have been a total of three reported in last five years is ridiculous. Again, responsibility is placed elsewhere. Eton Wick residents and TW know they have been storming throughout all seasons for many years. In March TW commented when discussing flood protocol, it would be impossible for TW to advise parties every time they went to storm discharge due to frequency! Without historical data we are unable to prove need to re-route storm effluent. The licence also details provision as 'in an emergency'. After three days of steady rain TW discharge to into Roundmoor at any point in the year ... three days should not count as an emergency situation.

We have requested RBWM use the spring flooding/TW failures and EA 'active investigation' to force re-assessment and re-licence/re-routing based on 2014 inflow/capacity/conditions to current regulations?

- h. *EA/TW to investigate and report on alternative options for discharge or handling volumes at Slough STW.*

Alternative options for discharge are really limited to the Jubilee. In terms of handling volumes, Slough STW is suitably sized in terms of process capacity and storm capacity to cope with current and future predicted flows and will, as with all our STW's, be subject to further development in each five year asset planning period in line with predicted growth in the catchment.

Please refer to our response to action 3C.

The decision has been made on the principle that the capacity of the channel cannot be reduced without increasing flood risk to Maidenhead, Windsor and Eton, we do not plan to carry out any further investigation.

However, we are happy to investigate an alternative proposals put forward by Thames Water.

RBWM to request detailed support data for decision.

- i. *EA to consider TW suggestion to discharge storm flows directly into the Jubilee, but balance capacity by engineering equal flows of Jubilee River water into Roundmoor. The village would still flood in extreme circumstances but not with storm effluent causing a public health risk.*

Please refer to our response to 3C and 3E.

RBWM to ask for detailed response.

- j. *EA to advise whether they could give approval for discharge licence into Roundmoor, under current legislation, if TW applied now.*

The site would be assessed on the information within an application and make a decision based on this information. We can only comment on an application when all of the relevant information has been received and would not want to comment on a hypothetical situation.

RBWM to request re-assessment/re-licence.

4. Watercourse maintenance:

TW acknowledge that whilst storm effluent continues to be discharged into Roundmoor, the flow should not be impeded ensuring all pollution travels through village as speedy as possible.

The EA attributed high stream levels to vegetation in Roundmoor and Boveney Ditches. Dorney/Eton Wick have been subjected to ongoing delays and difficulties in relation to EA clarity surrounding riparian ownership/maintenance. Historically the EA maintained but are unable to agree requirements with major landowners or appreciate they are expecting villagers to enter watercourses when the water could contain high level coliforms and human waste at anytime point during the year.

The EA state "they are unable to provide reassurance regarding impact on human health. The designated use of the water (e.g. abstraction for drinking, sensitive habitat) determines the standards we set for our quality monitoring. The only waters the EA monitor for bacteria and 'other things' that can be detrimental to people, are designated bathing waters. The Roundmoor Ditch is not designated bathing water, so the EA do not hold this information. During storming events the water quality deteriorates and they can understand why residents would not wish to enter the river during these events. The EA advice to those considering entering the river is that they need to carry out their own risk assessment and always take precautions because they can never be 100% sure about the quality of the river at any given time".

This may be acceptable for standard watercourses but unacceptable for a watercourse the EA licence for sewage discharge. Residents should not be expected to risk assess; the EA are missing the point completely – residents are not aware when storming has occurred or human waste is in the stream.

Actions:

- a. *EA to provide clarity on riparian ownership, responsibilities and work with landowners/residents to understand and achieve requirements.*

If you own land or property next to a river, stream or ditch you are a 'riparian owner'. If you are a riparian owner you have a legal responsibility to manage your own flood risk. A riparian owner must let water flow through their land without any obstruction, pollution or diversion which affects the rights of others. Others also have the right to receive water in its natural quantity and quality. You should be aware that all riparian owners have the same rights and responsibilities. A riparian owner should keep the banks clear of anything that could cause an obstruction and increase flood risk, either on their land or downstream if it is washed away. As a riparian owner you are responsible for maintaining the bed and banks of the watercourse and the trees and shrubs growing on the banks. Consent may be needed from the Environment Agency to carry out these works.

Further information on riparian ownership is detailed in our 'Living on the Edge' leaflet which can be viewed on our website:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297423/LIT_7114_c70612.pdf

The Environment Agency has powers to work on main rivers and the sea to manage flood risk. These powers allow us to do work. However, we do not have to maintain or construct new works on main river or the sea. We are unlikely to maintain a watercourse to improve the amenity of the river or to stop erosion that does not increase flood risk.

Representatives of the Environment Agency have held several meetings with the local landowners in recent weeks, the last meeting being on Tuesday 20 October 2014. Maintenance of both the Boveney Ditch and the Roundmoor Ditch was discussed at this meeting.

RBWM to re-iterate the EA are avoiding engagement with resident riparian owners. Re-quoting previous comments and excerpts from leaflet is insufficient.

On a watercourse EA licence for discharge at any time, residents should be supported with straight forward information including safety/equipment/health and hygiene requirements. The leaflet makes reference to the risk management authority which in this case is the EA.

We have asked EA present on riparian responsibilities including discussions with landowners, works completed to date/schedule for forthcoming works, silt contamination and date for sample results, expectations for regular landowner maintenance. maintenance responsibility for common land. Clear guidance regarding expectations for resident maintenance to banks and beds, which watercourses are affected throughout village, frequency of maintenance, what documentation and approvals are required, risk assessment, disposal of waste, safety and health requirements/precautions. Works should be carried out bearing in mind protection of stream and bank habitats.

- b. *EA to resolve issues with Dorney Commoners/land agents regarding vegetation and cattle poaching once and for all, ensuring village does not experience issues every year.*

Environment Agency officers are working with local landowners to resolve the maintenance issues and cattle poaching along the Roundmoor Ditch. We have requested all landowners involved develop a plan together; to carry out bank repairs, install designated cattle drinking points and repair fencing to prevent cattle from damaging the bank. We have had a positive response to our request, with both parties agreeing to carry out this work. We will continue to communicate regularly with the landowners. A future meeting is being planned on their proposal and we will assist in an advisory capacity. In late November/early December the Environment Agency will be carrying out further removal of the vegetation along the Roundmoor Ditch. Please note that while these works will help to reduce flood risk within this area, they will not remove the risk entirely.

This is not truly about flood risk and it's wrong to portray these works as flood alleviation. The aim of the works is to ensure storm effluent speeds through watercourse. RBWM to ensure all parties are aware why this work is being carried.

RBWM to highlight failed communication resulting in resident concerns.

RBWM to request details of planned forthcoming maintenance and plan for ongoing maintenance particularly in summer months to avoid high levels/restricted flow.

RBWM to request silt contamination results and, if positive, ascertain why not carried out throughout streams. If positive, confirm how residents are expected to dispose of material removed and why they are living next to contamination.

c. *EA to work with landowners/agents to monitor and enforce regular maintenance*

The Environment Agency in its advisory capacity will work with the landowners in this area to ensure a future maintenance regime is put in place.

We will monitor the site annually and raise any concerns with the relevant land owners .

d. *RBWM/TW/EA (responsible authority to be decided) procedure required to ensure watercourse bacteria levels are monitored and safe to enter for maintenance. Results to be published for public access.*

The EA is the relevant risk management authority for the Roundmoor Ditch (and Boveney Ditch) and is also responsible for investigating pollution incidents. It is suggested that this is something that could be reported and monitored by a local flood forum as suggested by the Environment Agency. RBWM would be an active part of a forum and would support the community voice in this regard.

Our responsibility is to ensure that treated effluent discharged to the watercourse is within the consent standards prescribed by the permit to discharge, and to ensure that storm discharges occur only in genuine conditions, whereby maximum flow to treatment is exceeded by high incoming flow and that adequate storm holding capacity is available and has been fully utilised before storm tanks discharge to the watercourse. We do not routinely sample the watercourse itself for bacteria levels unless we were monitoring to gauge recovery following a pollution event. Results in these circumstances would be discussed with the EA but would not normally be shared with the public, although we would do so on request. We do not give advice on public health, but have a duty of care to our staff, so are well aware of the issues and look carefully at risks. In our opinion, it is unlikely that even a serious pollution event would make the watercourse unsafe to enter for maintenance – anyone entering the watercourse for these purposes should be suitably trained and equipped to do so and observe good basic hygiene. This is the same approach we would take to any river at any time. On this basis, maintenance should always be possible unless the incident involved something extremely serious, such as spillage of a hazardous chemical. Routine sampling of the watercourse beyond our discharge point, if undertaken, would be an EA responsibility.

The Environment Agency only monitor watercourse bacteria levels in areas that are designated as 'bathing water'. As this watercourse does not have this designation we will not monitor bacteria levels here.

We do not advise people to enter the water due to a range of risks including natural hazards, leptospirosis and risk from pollution, without taking the appropriate precautions to ensure your Health and Safety. As with any water course, there is always a risk due to bacteria from animals etc, but basic safety precautions should minimise the risk to health.

RBWM to ask EA to document clear guidance and instructions on appropriate precautions. If they insist on resident riparian maintenance on a licenced storm effluent watercourse they should support residents to carry out tasks.

5. Watercourse monitoring:

Whilst the watercourses were originally designated 'ditches' Roundmoor and Boveney are now classified as a river. The ditches are 12-14ft wide and flows increase annually eroding farmland and gardens

Action:

- a. *RBWM/TW/EA (responsible authority to be decided) to survey and monitor watercourse width, depth and condition to understand effect of increased flows.*

As for question 4d.

This work would be the responsibility of the riparian owners and the EA, although we would seek to assist.

Please see our response to 4c.

The Environment Agency will conduct an annual visual inspection of the channel and advise the land. Owners of any required maintenance. Unfortunately we cannot provide this level of continual monitoring as we are not able to guarantee funding and staff time.

RBWM to further consider/ascertain appropriate responsible authority. Condition and volumes need to be monitored as increases have detrimental effect on residences.

6. Watercourse engineering and control:

Eton Wick was originally only subject to changes in the River Thames and surrounding minor ditches. The village is now an island between two major rivers and surrounded by ditches which are now classified as rivers.

The increasing problems illustrate our village is clearly being affected by surrounding watercourses.

Actions:

- a. *RBWM/EA and TW to examine overall effects including high groundwater levels, control of River Thames/Jubilee River/village watercourses and emissions from Slough STW.*

The EA is the relevant risk management authority for the Roundmoor Ditch (and Boveney Ditch) and progress with actions of this nature could be monitored through a local flood forum if established.

Our responsibility is the discharge from Slough STW. We have no jurisdiction over the Thames/Jubilee/village watercourses and no control over groundwater levels. We would be willing to contribute to any partnership initiative looking at the issues in the area.

The Jubilee River is a flood relief channel. The design philosophy of the Jubilee was to not allow inflow to the river from other watercourses or other drainage systems. This is why great effort and expense went into diverting the Chalvey Ditch, Salthill Stream, Roundmoor Ditch and Myrke Ditch under, over or around the Jubilee River. Groundwater has been allowed to support the river system.

The Jubilee River is operated in line with detailed procedures. It is operated in a controlled manner through incremental movements of the weir at Taplow, as the flow increases in the Thames the movements of the gates at Taplow weir become smaller. When the Jubilee River is operating, water levels on the River Thames through Maidenhead, Windsor and Eton are lower which essentially allows watercourses like the Roundmoor Ditch to discharge into the River Thames for longer.

However, in December 2013 the River Thames Catchment received almost twice the normal amount of rain and in addition a month's worth of rain fell in the first week of January 2014. The 2013/14 winter months were the wettest in over 250 years. The sheer volume of water received by the catchment meant we could not eliminate the risk of flooding.

There is no specific issue with groundwater in this area. This area is underlain by a gravel aquifer with mixed with alluvium, and alluvium at surface, so there is a local source of groundwater that locally will have variable connection to surface flooding and the River Thames. The winter weather was such that all aquifers were basically full and so surface discharge occurred in many places. The field flooding here was considered to be most likely damage to river banks due to cattle in the June investigation rather than gravel groundwater reaching the surface. The other cause was the saturated clayey alluvium taking a long time to drain back to the gravel aquifers from where it would discharge to the River Thames, hence slowing the drainage of the flooded land.

When Thames' levels fall gravel groundwater can discharge to it, which is why after the main Thames flood gravel groundwater flooding receded over a relatively short period of up to a few weeks in most locations.

RBWM to clearly state Roundmoor not taken under Jubilee River at great expense for Eton Wicks benefit. When JR constructed fresh water flow was cut off and great expense was incurred to purely provide outflow of 100% treated STW water and storm discharge. Their comment should not be seen as an advantage to the village.

Throughout this summer the village has been plagued with water ingress to homes and gardens. The EA and TW both confirmed ground water levels in surrounding areas had fallen to pre-flooding levels. Why not Eton Wick?

RBWM to question closely regarding damage to Jubilee River and effect on village. The reported damage requires more comment than just the publicised maintenance.

- b. *EA to examine Jubilee River and River Thames riverbeds and banks to assess current condition.*

The Environment Agency carries out regular bathymetric surveys of the River Thames and the Jubilee River that provides the profile of the river bed. Recent surveys were commissioned early this year following the winter flooding.

- c. *EA to re-assess Jubilee River including design, operation and flow modelling using latest software and in conjunction with current climate assessments*

The Jubilee River was successfully operated during the 2013/14 flood event. We always assess performance and look for ways to improve following operation of any of our assets including the Jubilee River. We then update our procedures accordingly.

Following the January 2003 flood event independent reports have been carried out to investigate the impact of the Jubilee River. The reports, particularly the Flood Risk Action Groups, Mechanisms of Flooding Report, which specifically looked at downstream effects found there to be no increased flood risk downstream for the 2003 flood event.

Further modelling is being carried out as part of the Lower Thames Scheme. This work does include the Jubilee River and the data/information collected during the 2013/14 winter flood event.

Hardly a success, when the EA allows village to be flooded by other watercourses.

RBWM to ensure re-modelling includes this area, as currently Lower Thames Scheme is downstream from Slough.

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- d. *EA to publish results of inspections.*

Any request for information should be directed to our Customer and Engagement Team by email on WTenquiries@environment-agency.gov.uk or by contacting our national customer contact centre on 03708 506 506.

RBWM to request.

7. Future planning:

Planning approvals for commercial and residential properties have affected (and will continue to exacerbate) volumes passing through Slough STW.

Actions:

- a. *RBWM/SBC and SBDC to review existing planning proposals for building in Slough STW catchment areas and anticipated effect on Slough STW treatment volumes and outflows.*

A representative from Slough BC planning team was invited to attend the meeting on 30 Oct and will also be invited to the public meeting in December. Advice has been provided by planning colleagues from RBWM who will also be in attendance at the meeting.

- b. *TW to report on effect of proposed volumes on Roundmoor and publish plans to mitigate increases.*

As detailed above, the Slough STW will continue to be developed in accordance with growth in the area leading to increased PE and higher flows. AMP6 (2015-2020) plans for Slough are not yet fully developed but these can be shared when the extent of any improvement work is understood. In terms of the effect on Roundmoor Ditch, this will be better understood once extensive clearance of the ditch itself has been completed, but our initial view is that it is unlikely to be significant.

8. Flood Forum

The EA have floated the idea of a Flood Forum for Eton Wick. However, the consensus is we need a task/results oriented team, with engaged, high level representation from all parties.

Actions:

- a. *RBWM create and lead a formal flood team.*

RBWM is more than willing to be involved in the establishment of a group such as this. The council will work with the Environment Agency in order to ensure that the group reflects local needs and adds value for residents of Eton Wick.

- b. *RBWM to publish meetings, reports and results for public information.*

It is suggested that the flood group would involve a proper minute of meetings etc. that would be published. The council is willing to work with the Environment Agency to establish how this will be operated in practice.

The Environment Agency welcome the formation of a flood forum for the Eton Wick area. The Environment Agency, RBWM, Thames Water and community representatives would be the core membership for the group. The aim of the group would be to mitigate and reduce the risk of flooding of properties and the impact of flooding on the communities in the Eton Wick area. The objectives of the group would need to be focussed on actions and we suggest the development of an action plan, which would be owned and monitored by the group. The group would be key in raising flood issues, contribute actions for the agencies and the communities and ensure these actions are delivered.

We have requested RBWM set parameters including storm discharges, watercourse maintenance, problems encountered throughout village. This is not just about flooding, flood planning and response.

9. Resident Information

Our resident group are currently responsible for reporting issues, collating information and updating residents.

Actions:

- a. *RBWM to take responsibility for informing and updating residents.*

The distribution of information and updates is a function that can be achieved through a local flood group/forum. RBWM is more than happy to work with the Environment Agency in establishing such a group and to be an active member of the group/forum. It is essential that this group is formed and operated to reflect resident requirements.

- b. *RBWM to act as formal channel for all resident questions and concerns, managing queries to other local authorities, TW and EA.*

As above, this is a function that can be incorporated as part of the operation of a local flood group/forum. RBWM will continue to champion and support our residents voice with other authorities or organisations.

The flood forum could also have a role in communicating updates to the wider community.

10. Public Meeting

The forthcoming meeting should have been a positive update on actions underway to improve discharge route. Instead Eton Wick has suffered a dry summer and watercourse related issues with mixed success. TW have been positive and pro-active, whilst the EA have continually failed to appreciate village issues as a whole, issues which will return year after year until they communicate truthfully and effectively.

Residents request the meeting is an open, honest, technically informative, supported meeting if we are to make progress.

Actions:

- a. *RBWM to arrange Public Meeting for November in Eton Wick Village Hall, attended by all parties.*

The meeting has been confirmed for 1 December 2014 at 7.30pm..

- b. *RBWM to collate formal questions/requests for technical data submitted prior to meeting*

The council will coordinate the submission of questions to relevant partner agencies in advance of the public meeting..

- c. *RBWM to manage attendees ensuring they provide technical data/reports and answer questions in full.*

The council will seek to achieve this but it has no legal or formal control over third party stakeholders. However, in the spirit of partnership seeking resolution it is hoped and anticipated that all partners will provide appropriate answers to all reasonable questions and queries made of them.