

Response form

Black Sluice Catchment Works Consultation

Your details

Name: Ian Warsap, Chief Executive, Black Sluice IDB

When we come to analyse the results of this consultation, it would help us to know if you are responding as an individual or on behalf of an organisation or group.

Please select from the following options:

- Responding as an individual
- Responding on behalf of an organisation (*Please specify which organisation or group you are responding on behalf of and include what type it is e.g. business, environmental group*)

BLACK SLUICE INTERNAL DRAINAGE BOARD

Other (*please specify*) _____

Please tell us if you would like to (tick all that apply):

- Receive an email acknowledging your response
- Receive an email to let you know that the summary of responses has been published

If you have ticked any of the boxes above, please provide us with your email address:

Email: ian.warsap@blacksluiceidb.gov.uk

Put a cross in this box if you are requesting non-disclosure of your response. Please provide an explanation to support your request.

Please tell us how you found out about the Black Sluice Catchment Works consultation:

- From the Environment Agency
- From another organisation
- Through an organisation you're a member of
- Poster
- Media article e.g. newspaper, radio or television
- Social media e.g. Facebook, Twitter
- Website e.g. borough or district council, IDB
- Briefing note or newsletter
- Parish council newsletter
- Through a meeting you attended

Other (please specify)

How we will use your information

The Environment Agency will make all responses publicly available during and after the consultation unless specifically requested not to. We will not reveal any personal data so all comments from individuals will be anonymous.

We will also publish a summary of responses on our website in which we will publish the name of the organisation for those responses made on behalf of organisations.

In accordance with the Freedom of Information Act 2000, we may be required to publish your response to this consultation, but will not include any personal information. If you have requested your response to be kept confidential, we may still be required to provide a summary of it.

Returning your response

Your response to this consultation needs to be returned by 27 September 2015.

We would like you to use this form if you are not submitting your response online. You can return it by email to BlackSluiceCatchment@environment-agency.gov.uk. Please use this email address if you have any questions regarding this consultation.

Or by post to:

**Black Sluice Catchment Works Consultation,
PSO Lincs,
Flood & Coastal Risk Management Team,
Waterside House,
Waterside North,
Lincoln, LN2 5HA**

We welcome your views on the options for the Black Sluice Catchment Works.

Options for the Black Sluice Pumping Station

1a. Which options do you support for the Environment Agency operated Black Sluice Pumping Station in Boston? (Please tick all that apply)

- Do nothing
- Do minimum – Removing the pumps

x Replace two pumps (current 30 cumecs capacity)

- Replace one pump (15 cumecs capacity)

x Transfer to Black Sluice Internal Drainage Board (BSIDB)

Please explain your answer.

There is a requirement to proactively pump down the SFFD along with the Boards catchments before predicted prolonged heavy rainfall as well as during extreme fluvial events within the catchment. The Black Sluice Pumping Station pumps are the only option available to pump water from the SFFD therefore it is paramount to retain this important facility.

Reducing water levels before an event from an efficient and effective SFFD by gravity discharge at low water tides and controlled pumping at medium and high water tides will increase capacities within the SFFD, therefore helping to reduce catchment flooding during a fluvial event. By increasing the capacity of the SFFD, through effective maintenance and offering continuous pumping into the Haven the Boards thirty nine pumps alongside the SFFD can continue to lift water from the catchments instead of having to be switched of when the SFFD water levels reach +2.70m ODN. The thirty nine pumps housed within twenty two pumping stations can lift 50.2cumecs, therefore a greater pumping capacity than this is required at the Black Sluice Pumping Station due to the eight unrestricted main river highland runners also running into the SFFD. Should there be no pumps available at Black Sluice Pumping Station this could in an extreme event result in a flooding risk and potential losses to land, property and business owners within the c120,000 acres of the lower catchment.

The existing pumps require further expert investigative works before they are written off as refurbishment to pump components could be one of several options moving forward. This option has been employed by the EA at other pumping stations with damaged diesel pumps

following the December 2013 tidal surge. It is important that all of the fluvial assets and watercourses within the catchment are operated in a coordinated way. Given the scale of the catchment and the reduction in maintenance by the Environment Agency within the catchment, full transfer to BSIDB in this circumstance appears the most viable long term solution to securing the safe management of water levels. BSIDB have adequate expertise to undertake the works necessary on the main river and at Black Sluice Pumping Station. However, it is essential that if the Board is to undertake more work previously carried out by the EA then the precept paid by the Board to the EA should be proportionately reduced or removed.

The BSIDB are dependant on the efficiency of the EA to adequately maintain their main rivers and the associated Black Sluice Pumping Station. Unlike Internal Drainage Boards the EA are not a land drainage authority and are concentrating their efforts on flood risk management, therefore there is a requirement for our drainage board to take control of the existing EA assets within the catchment to become self sufficient in the future.

1b. Are there any options that you do not support for the Environment Agency operated Black Sluice Pumping Station in Boston? (Please tick all that apply)

x Do nothing

x Do minimum – Removing the pumps

Replace two pumps (current 30 cumecs capacity)

x Replace one pump (15 cumecs capacity)

Transfer to Black Sluice Internal Drainage Board (BSIDB)

Please explain your answer.

Do nothing or do minimum - removing the pumps is not an option. The Environment Agency have confirmed that all five pumps have been running on at least three occasions (1968, 1977 & 1981). In 1968 all five pumps ran for 17 continuous hours, this equates to pumping 1,469 Olympics size swimming pools, if this water had not been pumped from the SFFD there would have been a major breach(s) following overtopping of the raised banks.

In 1999 a major breach occurred on the east side of the SFFD downstream of the Boards Black Hole Drove PS, all the Boards pumps were switch off and the Black Sluice Pumping Station pumps were used to pump the SFFD down to allow some of the escaped water to run back through the breach into the SFFD before the breach was repaired.

If the pumps were removed and a fault occurred to the gravity outfalls (boat damage, vandalism, terrorism, gate malfunction, etc) there are **NO** alternatives available to remove water from the SFFD.

Options for the Lower Black Sluice Catchment

2a. Which options do you support for the Lower Black Sluice Catchment (Fenlands)?
(Please tick all that apply)

- Do nothing
- Do minimum - Continue with current maintenance

x Make flood products (known as 'property level flood protection') available to homes most at risk

x Protecting low points along the raised embankments from erosion

Please explain your answer.

Although property level flood protection is the 'last resort' this should be made available to homes most at risk.

The most vulnerable points along any raised banks with the lower catchments are the low points and/or the narrow in width raised bank lengths. Lifting the bank heights to a uniformed level and reinforcing bank strength by bank width enlargement are both strongly supported by BSIDB.

The uncompleted 1960's/70's Environment Agency works of widening a significant length of the SFFD (Swineshead Bridge to Donington A52 Bridge) must be completed in order to allow sufficient quantities of water to flow to the Black Sluice Pumping Station. The Board also promotes an enhanced maintenance regime - It is important that appropriate maintenance of the South Forty Foot Drain is undertaken periodically. Cutting of emergent and bank side vegetation is essential to maintaining the conveyance of our lowland watercourses. As an absolute minimum an annual water course and single bank side cut to all main rivers must be carried out with enhanced activities to the SFFD (de-silting, weed cutting, bushing, vermin control, etc)

2b. Are there any options that you do not support for the Lower Black Sluice Catchment (Fenlands)? (Please tick all that apply)

x Do nothing

x Do minimum - Continue with current maintenance

- Make flood products (known as 'property level flood protection') available to homes most at risk
- Protecting low points along the raised embankments from erosion

Please explain your answer.

Do nothing or do minimum - continue with current maintenance is not an option. Due to reduced finances very little maintenance to the main river network within the lower catchments is carried out.

The EA have employed the BSIDB through their Public Sector Co-Operation Agreement to carry out restricted summer vegetation clearance over the past two years. This has helped identify the poor condition of the river banks and watercourses throughout the catchment, this has been brought to the attention of the EA.

Options for the Upper Black Sluice Catchment

**3a. Which options do you support for the Upper Black Sluice Catchment (Highlands)?
(Please tick all that apply)**

- Do nothing
- Do minimum – Continue with current maintenance

x 'Slowing the flow' upstream to hold water back

x Increased channel maintenance downstream of villages

x Make flood products (known as 'property level flood protection') available to homes most at risk

Please explain your answer.

The EA should continue their investigations with land owners around 'slowing the flow' in upstream areas, any amount of runoff water withheld from the current watercourse systems goes towards reducing the flood risk to the 'at risk' villages in the upper catchments.

The EA have employed the BSIDB through their Public Sector Co-Operation Agreement to carry out restricted summer vegetation clearance over the past two years. This has helped identify the poor condition of the river banks and watercourses throughout the upper catchment (this has been brought to the attention of the EA) therefore any increased channel maintenance would help reduce the risk of flooding.

Although property level flood protection is the 'last resort' this should be made available to homes most at risk.

A balance of all measures listed above will be necessary in the future to manage flood risk within the catchment.

3b. Are there any options that you do not support? (Please tick all that apply)

x Do nothing

x Do minimum – Continue with current maintenance

- 'Slowing the flow' upstream to hold water back
- Increased channel maintenance downstream of villages
- Make flood products (known as 'property level flood protection') available to homes most at risk

Please explain your answer.

Do nothing or do minimum - continue with current maintenance is not an option. Due to reduced finances very little maintenance to the main river network within the upper catchments is carried out.

The EA have employed the BSIDB through their Public Sector Co-Operation Agreement to carry out restricted summer vegetation clearance over the past two years. This has helped identify the poor condition of the river banks and watercourses throughout the catchment, this has been brought to the attention of the EA.

4. Do you represent a group/business/organisation that may be able to work with us to deliver any of these options?

x Yes

- No
- Don't know

If yes, please explain how you may be able to help.

BSIDB and the EA are members of the Association of Drainage Authorities which is the membership body for water level management in England. ADA have stated they are committed to working with both our organisations to assist us in finding a mutually agreed solution to deliver a sustainable catchment wide solution, therefore we should include ADA in future consultation developments.

Other questions on the Black Sluice Catchment consultation

5. Can you provide us with any evidence (e.g. photographs, dates, eyewitness accounts) of flooding in the catchment? Please send to BlackSluiceCatchment@environment-agency.gov.uk.

The Board has numerous flooding and other associated issue evidence available, may we suggest a joint meeting is held at our offices in order to review our evidence.

Photographs and data includes:-

SFFD breaches and lower catchment flooding

SFFD high silt levels

Main river poor bank and watercourse maintenance

Main river damage to banks by mammals

Poor levels of biodiversity within the SFFD due to low levels of maintenance compared against the Boards maintained SFFD

Main river overtopping and upper catchment flooding

6. Please tell us if you have any further comments to make on the future management of flood risk in the Black Sluice Catchment.

The BSIDB have five 'preferred options' :-

- All Environment Agency (EA) main river assets within the Black Sluice Catchment transferred to the Black Sluice Internal Drainage Board (BSIDB) in good working order over an agreed timeframe.
- The uncompleted South Forty Foot Drain (SFFD) widening/water flow enhancements works to be completed by the EA.
- The EA to repair the old pumps and/or install new electric pumps at Black Sluice Pumping Station (BSPS) in order to provide a combined 60cumecs pumping capacity.
- DEFRA financial grants awarded to BSIDB and/or a reduction in the EA precept to assist with the additional maintenance costs associated with the BSPS and main rivers following the asset transfer over an agreed period of time (c5 years).
- BSIDB to undertake all main river maintenance works for the EA within their Public Sector Co-Operation Agreement (PSCA) until a time the transfers are complete.

BSIDB is disappointed by the nature of the language used in the covering statement, press releases and consultation document, which appear to strongly disfavour replacement/repair of the pumps in the Black Sluice Pumping Station. It fails to properly articulate the importance of managing the fluvial assets within the system in a coordinated manner and overlooks the wider role our Board plays to serve people and property within our district through our own assets which are dependent on the good management and operation of the main river assets including Black Sluice Pumping Station. There appears to be a selective description of the costs of operating and replacing the pumping station and insufficient consideration of repairs that may be feasible for a fraction of those costs. Our Board have as you are aware made contact with a company capable of providing us with accurate detail on any level of damage caused to the equipment within the pumping station following the 2013 tidal surge which will include accurate quotations to rectify any damage, we await their responses.

We must bear in mind any future implications the Fens Waterways Link and navigation would have on our catchment, in particular alterations to the SFFD relating to increased capacities, flow directions and water storage.

Finally, no valuation is provided of the damage to land and property (£1.45 billion of land alone within the lower catchment) beyond those that the Environment Agency determines to be 'homes and businesses'. It is essential that the full extent of the risk and potential losses from farmland, farm buildings, IDB pumping stations and other important infrastructure is quantified and any knock on consequences accurately identified. Furthermore, the documents do not quantify the knock on impact any losses would have to businesses dependent upon local agricultural output, which alongside tourism is critical to our catchments and Lincolnshire's economy.