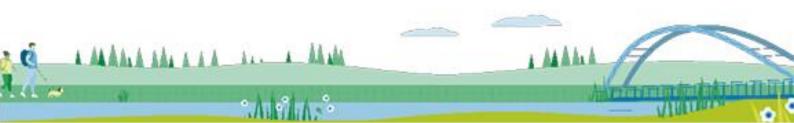


Gooseum Rhyne Reservoir Improvement Scheme

October 2023 - consultation report

Environment Agency





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Executive Summary

This report summarises feedback received on the proposals that were presented in October 2023 for the Gooseum Rhyne Reservoir Improvement Scheme. This feedback was collected following two public drop-in events held at Old School Rooms in Congresbury on 14 and 18 October 2023. The report contains analysis of completed feedback forms and emails received up until 03 November 2023.

The public drop-in events had 100 people attending over the two days. To publicise the event, a letter was sent to 1,470 residents and businesses within Congresbury, promotional posters were placed in information points within Congresbury and Yatton, an email was sent to the mailing list, and adverts were posted via social media channels.

Twenty-five completed feedback forms were received, with most people responding saying they'd heard about the event via a letter from the Environment Agency. Analysis of the responses showed that 29 per cent were in support of the proposals, 13 percent were neutral, and 58 percent were against, the key reason given in support was the improvement to the flood defences, and the main reasons given against were the loss of trees and space within the Millennium Green, not understanding why the scheme was needed, the risk of increased antisocial behaviour, and the negative impact construction would have.

This report lists all the themes identified across all feedback received. The themes have been sorted into areas of support, questions, concerns, and comments/suggestions.

Responses to each theme are provided in section 3 of the report; however, considering the community's concerns throughout each consultation process, other options have been reviewed to see if there is an alternative approach that would avoid much of the impact to the community and which could be achieved in the legal time frame.

The option that has been considered is to make changes so that the area is no longer required to be classified as a reservoir.

To achieve this, it needs to be demonstrated that the area can't physically store enough water to be classed as a 'large raised reservoir'. It would also need to be ensured that other problems wouldn't be created, such as reducing the existing standard of defence or increasing flood risk to other areas.

It has been established that the reservoir can be de-regulated, meaning the area would no longer be subject to the same regulations, and will remove the need for the substantial works previously proposed. In practice, this will require creating a lowered section in the Congresbury Yeo embankment to allow better connectivity between impounded water in the Millennium Green and the river.

The viability investigations are underway, and the aim is to deliver a solution that can retain most of the existing features of the area. This revised option will be presented to you next year when further details are available.



1. The consultation

The consultation that took place in October 2023 was for the proposals to improve the reservoir. Although it has now been established that the reservoir can be deregulated, the deregulation option was not presented at consultation as it had not been confirmed as a viable option at that time. The information in this section is based on the proposals that were consulted on in October 2023.

1.1. Project overview

The Gooseum Rhyne reservoir flood defence is located in Millennium Green, Congresbury. The reservoir is formed by the raised riverbanks of the Congresbury Yeo and embankments along its northern and eastern edges.

Currently, when water levels in the River Yeo rise enough to spill into the fields, the reservoir will begin to fill up. When water levels in the river drop, water will gradually flow back into the river through the culvert near the basketball court. The embankment around the edge of the Millennium Green protects properties on the northern side of the River Yeo from flooding.

It is currently classified as a reservoir under the Reservoirs Act 1975 due to the volume of flood water it can hold above natural ground. Due to this classification, the Environment Agency has a legal responsibility to ensure the continued safety of the embankments and water control structures.

1.2. The consultation

To present the proposals for the reservoir and gather feedback, two public drop-in events were held at Old School Rooms in Congresbury on 14 and 18 October 2023.

1.3. Materials

To provide information on the proposals the following material was produced:

- Eleven display boards explaining the proposals and showing what the Green could look like once the work is complete. These were also placed on the consultation web page.
- A two-sided feedback form for people to fill out at the event, or to take away with them.

1.4. Methods

A combination of channels were used to present the proposals and capture feedback, including:

- Continuing engagement with stakeholders via email and face to face workshops
- Two public drop-in sessions held at the Old School Rooms in Congresbury on Saturday 14 and Wednesday 18 October 2023.
- A consultation web page.
- Responses to questions submitted via the phone and email.



1.5. Promotion

The consultation was promoted through:

- A letter sent to 1,470 residents and businesses within Congresbury, including all properties surrounding the Millennium Green.
- Email invitation to our mailing list.
- Posters located at various information points within Congresbury and Yatton.
- Social media activity.
- Our consultation web page.

1.6. How the consultation went

The public drop-in sessions had 100 people attending across the two days. Twenty-five completed feedback forms were received. Of those that provided feedback, 29 per cent were in support of the proposals, 13 per cent were neutral, and 58 per cent were against, the key reason given in support was the improvement to the flood defences, and the main reasons given against were the loss of trees and space within the Millennium Green, not understanding why the scheme was needed, the risk of increased antisocial behaviour, and the negative impact construction would have.



2. The feedback

2.1. Multiple-choice questions

Responses to the multiple-choice questions have shown us that 62 per cent of people heard about the event via a letter from the Environment Agency, 68 per cent understood, or partly understood the scheme, 29 per cent were in support of the scheme and 58 per cent are currently against, and 77 per cent felt the information displayed at the event was clear and easy to understand.

Table 2.1: multiple-choice feedback on how people heard of the event.

Q1: How did you hear about this event? (Please tick all that apply)		
Response	Number	
A letter from the Environment Agency	18	
From another organisation*	3	
Social media	1	
Promotional poster	5	
Other**	2	
*Organisations listed in responses: Millennium Green Trust, Congresbury Parish Council.		
**Other ways people heard of the event: Council Clerk, word of mouth.		

Table 2.2: multiple-choice feedback on how well people understand what we're trying to achieve

Q2: Following today's event, how well do you understand the need for improvement at the Gooseum Rhyne Reservoir, and what we're trying to achieve?		
Response	Number	
Fully	9	
Partly	6	
Not sure	3	
Don't understand	4	

Table 2.3: multiple-choice feedback on how people feel about the scheme

Q3: What best describes your feelings towards our updated proposals?		
Response	Number	
Support	7	
Neutral	3	
Against	14	



Table 2.4: multiple-choice feedback on the previous feedback given

Q4: If applicable, do you feel our updated proposals reflect feedback you've given previously for this scheme?

Response	Number
Fully	0
Partly	5
No	6
Not applicable	9

Table 2.5: multiple-choice feedback on whether the information displayed was clear

Q6: Was the information displayed at the event clear and easy to understand?	
Response	Number
Yes	17
No	5

2.2. Public feedback

The table below lists all topics that were identified via the feedback received under the headings support, questions, concerns, and comments/suggestions. Responses have been provided to each of these topics in section 3 of this report. To avoid too much repetition, the topics below have been grouped into themes in section 3, and a response code has been provided below which will take you to the corresponding response. Areas of support for our proposals as they were presented in October 2023, that don't require a specific action, have been listed as 'N/A'. These themes, along with all the feedback, have been shared with the project team.

Table 2.6: topics from public feedback

Support	Response code
Improvements are needed to support better flood management.	N/A
It is better that you're being proactive, rather than reacting after a flood event.	N/A
It is good that you're minimising the risk of flooding.	N/A
If it looks as good as your boards, it should be a lovely place to visit.	N/A
I don't see an alternative.	N/A
Your work will help the area not just the village.	N/A
We are happy that you plan to improve disabled access to the Green.	11



Questions	Response code
Are there any vulnerabilities in the south bank?	7
Can you explain more about the topography of the area, including a copy of the survey?	2
Is there a record of the reservoir being registered?	1
Can you provide a cross section to show changes to the embankment?	10
Can you provide a diagram that shows the likely effect of a flood event on water levels within the Green?	3
Why have you not included the threat of flooding to homes in Gooseham Mead from the small Rhyne next to the street within the proposals?	7
Why are you only proposing to strengthen the northern bank?	7
Why are you diverting the Rhyne away from where the bank is already strengthened?	18
Can you provide information on your flood water modelling	3
Why can't the Rhyne on the west side be culverted or covered in some way to reduce loss of trees?	18
What are the precise details of the gates either end of the access strip?	9
What are your plans to mitigate antisocial behaviour?	9
What are your plans to mitigate construction noise for the residents of Gooseham Mead?	21
Will you carry out before and after surveys of houses/streets for any vibration damage or settling?	21
I believe there was an agreement in place regarding the Millennium Green and the amount of concrete or other materials that could be laid on this particular area, so that it was fully protected for the village, has this been overridden?	6
Can you provide a cross section showing how much the west Rhyne will be moved?	10
Where will the existing structures be re-sited after work?	12



Can you provide land ownership plans of the EA and the Parish Council to help understand boundaries and future obligations?	1
What is the flood risk benefit of the northern embankment?	3
When was the Millennium Green registered as a reservoir?	1
Are you doing this just to make maintenance easier and save on costs of grass cutting?	6
Can the Reservoirs Inspection report 2015 that identified the MIOS works be shared with the public?	1
Can the entrance adjacent to the basketball court be surfaced for wheelchair access?	11
Can you plant prickly plants along the access track to dissuade antisocial behaviour?	9
Do other parts of the reservoir structures need improved maintenance?	12
How far are you moving the Rhyne near the basketball court into the Green?	12
Why couldn't the Rhyne be culverted under the embankment longitudinally, to avoid the loss of the trees opposite the basketball court?	18
Can you share information on existing flood risk?	3
What is the Standard of Defence against overtopping of the northern and the southern embankments?	3
Can you install live cameras so we can see the wildlife in the Green?	16
Concerns	Response code
The project isn't needed.	4
The project doesn't improve flood defences for the villages.	7
The project is too expensive, there must be a less costly option.	5
The project will spoil the Millennium Green.	15
The project is taking too much land away from the Millennium Green.	15
There isn't a clear vision for the footpath on the north side.	12



Too many trees are being removed.	14
It is disappointing the Green will be full of work vehicles during construction.	21
The proposals are disproportionate to the actual flood risk.	6
There are concerns about security and increased antisocial behaviour.	9
The proposals only partially improve the defences, more vulnerable areas have been neglected.	7
There is concern over the length of construction and disruption.	21
There is concern over the loss of public car parking for the village.	21
There is concern over the loss of the play area during construction.	21
There is concern over adding areas for ground mammals and reptiles, with dogs using the Green.	16
There is concern that the access track is more substantial than implied due to required vehicle use.	8
There is concern over the destruction of well-established habitats (including that for screech owls, bats, newts, slow works, badgers, foxes, muntjack deers and herons).	16
It will take years for the replacement trees to look like the presented visuals.	14
The project shows a lack of understanding of a natural area of beauty and the wildlife that lives there.	16
There is concern that no one was able to confirm which trees would be removed.	14
Suggestions/comments	Response code
There are better things you could use the money for, such as ongoing maintenance of the river, Rhyne, and existing defences	5
It is the bridge over the river that restricts flow and causes flooding. You could raise it, make it bigger, or put a culvert under the road.	20
There is a flood plain on the Yatton side.	17
The reservoir is essentially a flood plain that drains quickly.	19



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Your whole project centres on the definition of a 'reservoir'.	19
We don't believe the banks will subside.	4
During the last significant flood event in 2012, the water level peaked at 1.5 metres below the top of the northern embankment.	4
Properties south of the river are more at risk of flooding than those to the north.	7
You should use the flood plain downstream.	17
The area doesn't flood that often.	4
You should install a robust barrier at all access points to the access track.	9
You have not maintained the current defences, nor have you dredged the river or Rhyne in over 20 years.	5
Water levels have changed due to numerous housing developments.	3
Water levels have changed due to the removal of trees and land that absorb water.	3
Your improvement scheme is to facilitate building more houses.	6
Why not make the access track an amenity resource for the village.	8
Plant more trees to help with drainage.	14
You should consider a wooden fence across the bridge rather than a metal one.	13
You should plant more trees on the northern side as what you've illustrated is very sparse.	14
Pollution from 'upstream' run-off into the river may affect vegetation in and around Millennium Green.	7
We do not want the memorial bench to be put back in, or near, its current location.	12



3. Our response to your feedback

Table 3.1 on the next page provides responses to the feedback received. To avoid repetition, responses to individual questions haven't been provided, rather similar questions/comments have been grouped into themes and placed under the following headings:

- Background
- The scheme
- Environmental impact/impact on the Green
- Alternative solutions
- Construction

Some of the responses provided are based on the proposals that were presented in October 2023. However, an alternative approach has been considered that would avoid much of the impact to the community and which could be achieved in the legal time frame.

The option that has been considered is to make changes so that the area is no longer able to be classified as a reservoir.

To achieve this, it would need to be demonstrated that the area can't physically store enough water to be classed as a 'large raised reservoir'. Also it would also need to be ensured that other problems wouldn't be created, such as reducing the existing standard of defence or increasing flood risk to other areas.

It has been established that the above can be achieved, meaning the area would no longer be subject to the same legislation. In practice, this will mean creating a lowered section in the Congresbury Yeo embankment to allow better connectivity between impounded water in the Millennium Green and the river.

The viability investigations are underway, and the aim is to deliver a solution that can retain most of the existing features of the area. The revised option will be presented to you next year when further details are available.



Table 3.1: Our responses to your questions and comments

Background			
Response Code	Theme	Our response	
1	The reservoir: When was the area designated as a reservoir and why was the Parish Council and Millennium Green Trust not informed at the time, and can you provide landownership plans for future obligations? Can the reservoir inspection report that outlines the improvements that are required be made public?	The reservoir was registered in 2006 following a national review of the volumes of water held in flood storage areas. This was carried out because the Environment Agency became the national regulator for reservoirs around this time (the responsibility had previously been with individual local authorities), and the Environment Agency wanted to ensure that all its flood storage areas were managed under appropriate legislation. The Parish Council and the Millennium Greet Trust were not informed about the reservoir designation because it was felt that the structures were already being managed by the Environment Agency as existing flood defences and this would continue, albeit with a greater emphasis on inspection and management. Landownership information is available from the Land Registry. The designation of a reservoir does not affect the ownership of land. The Reservoir Section 10 Inspection Report can be requested via the Environment Agency's National	
		Customer Contact Centre, but there are clearly defined	

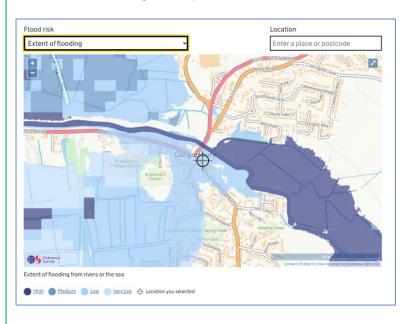


		pieces of information that are mandated by government to be withheld. The UK Reservoir Safety Liaison Group National Protocol for the Handling, Transmission and Storage of Reservoir Information and Flood maps is the guidance document for what information relating to reservoirs is allowed to be made public. Following this protocol, much of the information in the Section 10 report, including the Measures in the Interest Of Safety, would be redacted. National Customer Contact Centre PO Box 544 Rotherham S60 1BY Email: enquiries@environment-agency.gov.uk Telephone: 03708 506 506
2	Topography: Can you provide more details on the topography of the area?	A topographical survey of the area has been provided in Appendix A.
3	Flood risk: It would be useful to have more information on the existing flood risk, and your standards of protection on both the north and south embankments, and what changes if any have occurred with the increased housing developments and loss of land and trees.	The flood risk map shown below, which was obtained from GOV.uk shows that the areas immediately outside both the northern and the southern embankments have a flood risk from the main river of 'Low' - which means their risk of flooding is between 1% (1 in 100) and 0.1% (1 in 1,000) each year. This reflects the standard of defence that is provided by the embankments. The standard of defence is



not affected by any changes in land use outside of the reservoir structures.

You can check your flood risk via https://check-long-term-flood-risk.service.gov.uk/postcode.



The scheme		
Response code	You said	Our response
4	Need for the scheme: The scheme is considered unnecessary as the flood risk is low and the current defence already does its job.	The reservoir was inspected by a specialist reservoir engineer (Panel Engineer), under the Reservoirs Act 1975, who determined that the embankment along the northern



		edge of the reservoir required 'Measures in the Interests Of Safety', and these Measures must legally be carried out by the Environment Agency.
		The Measures address the concerns of the Panel Engineer that the embankment is too narrow and too steep to allow modern, safe methods of maintenance and needs to be made more resilient to extreme flood events in order to meet reservoir standards.
		However, as we are now looking at declassifying the reservoir, the scheme as it was presented to you in October 2023 will not be going ahead. We plan to present updated proposals in February/March 2024.
5	Cost of the scheme: The scheme is too expensive, surely there is a less expensive alternative such as dredging the river and Rhyne, which you don't already do. Either that, or you should spend public money where it's needed	Flood risk projects across the country are prioritised on their legal requirements and on the flood risk benefits they bring to the area. As the Millennium Green is currently classified as a reservoir, the project is legally required until such time that it can be declassified.
	more.	The works that will enable de-classification of the reservoir are much smaller in scale and will cost much less.
6	Size of scheme: The proposals are disproportionate to the flood risk, how can you justify this? Also, isn't there an agreement in place regarding the amount of concrete or other materials that could be put in this area?	The objectives of the project were to satisfy the statutory Measures in the Interest Of Safety for reservoir standards. These Measures are not related to the flood risk.
		The Environment Agency always seeks to minimise the carbon impact of its works and to maximise the environmental benefits associated with its works.



7	Scheme benefits: Who will benefit from the proposed work, and how will the work improve defences for those living south of the river? Won't pollution from upstream run off into the river and affect the vegetation in the Green? Also, why are you only looking at the northern embankment? It seems you've neglected more vulnerable areas, such as the south bank and houses on Gooseham Mead at risk of flooding from the small Rhyne next to the street.	The work is legally required under a statutory process and will bring the benefit of a reservoir with better resilience to extreme events and better able to be maintained safely. The Flood Risk Assessment shows that the project will maintain the current balance of flood risk between the north and south sides of the river. The ditches that currently flow under the embankment will be maintained by the project with new culverts and new trash screens that can be cleaned more easily. This will keep the drainage routes flowing better.
8	Access track: Given the requirement for vehicle access, we believe the access track is more substantial than you've implied. Also, can the track be made an amenity resource for the village?	The access track for maintenance was proposed to be the minimum width allowable under the Environment Agency's Health and Safety operating guidelines. The new proposals to declassify the reservoir will mean that an access track of this nature is no longer required. We plan to present updated proposals in February/March 2024.
9	Antisocial behaviour: We are concerned that your proposed access track will be a security risk and lead to increased antisocial behaviour. What are your plans to mitigate this? Do you plan to install sturdy gates at either end of the track? There should also be a gate at the main entrance by the A370 road bridge to prevent unwanted vehicle access, will this form part of your proposals?	We understand the queries raised around the issues of anti-social behaviour. The new proposals to declassify the reservoir will mean that an access track of this nature is no longer required. We plan to present updated proposals in February/March 2024.



10	Cross sections: It would be helpful to see cross sections of the design, including the changes to the embankment and the Rhyne realignment.	The proposals that were presented to you in October 2023 are no longer proceeding as shown. Once we have a revised design, we will ensure we include cross sections for your information. We plan to present updated proposals in February/March 2024.		
11	Disabled access: Can you elaborate on your plans for disabled access into the green, such as the entrance next to the basketball court and at Well Park.	As we are now pursuing the option of declassifying the reservoir, disabled access into the Green is being reviewed. We plan to present updated proposals in February/March 2024.		
12	Scheme design: Can you provide more detail on the design, such as plans for the northern footpath, where existing structures will be moved to following the work ending, whether other reservoir structures need to be improved, how far the Rhyne is moving into the green.	We are now pursuing the option of declassifying the reservoir, and the viability investigations have just been completed. We are aiming to deliver a solution that can retain most of the existing features of the area, not realign the Rhyne, and not take away any of the Millennium Green. We plan to present updated proposals in February/March 2024.		
13	Bridge design: Would you consider a wooden fence across the bridge rather than a metal one?	This bridge will no longer be affected by our new proposals, which we plan to present in February/March 2024.		
Environment	Environmental impact/impact on the Green			
Response code	You said	Our response		
14	Trees: There are too many trees being cut down, although no one seems to be able to confirm which ones, you should be planting more trees, such as along the northern side, not taking them away, as it	When developing the proposals that were presented to you in October 2023, every effort was made to ensure we retained as many of the existing trees as possible; however, the footprint of the works together with the		



	will take years for any replacement trees to look like those in your visuals.	construction access unfortunately meant that a number of trees would have needed to be removed.
		As we are now pursuing the option of declassifying the reservoir, we are aiming to deliver a solution that can retain most of the existing features of the area and leave the trees untouched, although some scrub clearance may be necessary. We plan to present updated proposals in February/March 2024.
15	Impact on the Green: The impact on the Millennium Green is too great. Too much of it is being taken away.	We understand your concerns and are now pursuing the option of declassifying the reservoir, and are aiming to deliver a solution that can retain most of the existing features of the area and not encroach at all into the Millennium Green.
16	Wildlife: We are concerned over the loss of habitat; we don't feel you understand the area or the wildlife and are worried over the addition of areas for ground mammals and reptiles given dogs use the common. It would be great to be able to see the wildlife through live cameras perhaps.	There would be a loss of some grassland, woodland, ditch, and scattered tree habitat. This would have been mitigated through the creation of a newly aligned ditch and the replacement of grassland and scattered trees where possible within the Scheme design, which would have resulted in the main characteristics of the site remaining the same post-development (i.e., a ditch system with adjacent tree and grassland planting). This also means the Site would continue to support a similar species diversity as was recorded prior to works (including bats, grass snake, slow worm and a variety of small mammals and birds such as barn owl). Onsite enhancements such as bat and bird box installations, barn owl hunting post and creation of hibernacula for small mammals and reptiles would provide additional resources for species already recorded on site. It



		is worth noting that there is already a good population of grass snake and slow worm present on both banks of the Gooseum Rhyne and River Yeo, and so it is evident that they are surviving well alongside the current level of disturbance from the public.
		For any deficits in compensation, and to provide additional enhancement in line with statutory Biodiversity Net Gain requirements, we would be liaising with Belmont Estate and/or YACWAG to identify nearby off-site land which would enhance/create priority habitats such as wet woodland, orchards, rivers (details and designs TBC).
		As we are now pursuing the option of declassifying the reservoir, we are aiming to deliver a solution that can retain most of the existing features of the area and leave the habitat untouched. We plan to present updated proposals in February/March 2024.
Alternative s	olutions	
Response code	You said	Our response
17	Flood plain: Have you considered the Yatton flood plain downstream?	The MIOS project is required to maintain the current level of flood protection whilst making the reservoir embankment in line with reservoir standards. The Yatton flood plain would not be affected by this statutory reservoir project. When developing the option to declassify the reservoir, we will consider any effects on the Yatton flood plain.



18	The Rhyne: Why are you planning to divert the Rhyne away from where the bank is already strengthened, and as you are doing this, have you thought about culverting the Rhyne on the west side longitudinally under the embankment to avoid loss of trees?	The proposed design we presented in October 2023 was the best balance of minimising impacts to the amount of open space in the Millennium Green and the avoidance of impacts to the Youth Club and basketball court. We did look at the possibility of culverting the Rhyne longitudinally under the relocated embankment, but the zone of engineering weakness was not acceptable to the reservoirs Panel Engineer.
19	Definition of a reservoir: It appears the whole project centres around the definition of a 'reservoir', essentially, the Green is just a flood plain which drains quickly enough. Is there a way it to stop it being classed as a 'reservoir' to avoid the need for this scheme?	We have investigated the option of declassifying the area as a reservoir and our viability work has shown that this is possible. After the work is carried out the area will no longer be subject to the same stringent reservoir regulations. To achieve the declassification we will need to create a lowered section in the Congresbury Yeo embankment to
		allow better connectivity between impounded water in the Millennium Green and the river. We are aiming to deliver a solution that can retain most of the existing features of the area. We plan to present updated proposals in February/March 2024.
20	Bridge over the A370: We believe it is the bridge over the A370 that restricts the flow and causing flooding. Have improvements such as raising it, or culverting it, been considered?	This bridge is under the ownership and responsibility of the Council Highways dept. The objectives of the project were to satisfy the statutory Measures in the Interest Of Safety for reservoir standards. These Measures are not related to the flood risk.



Construction	Construction		
Response code	You said	Our response	
21	Construction impact: We are concerned about the impact of construction, with vehicles and construction staff being in the Green itself, the noise to nearby residents, the loss of facilities such as car parking and the playground. How will you mitigate these impacts, and will you be carrying out before and after surveys on nearby properties?	Our contractors are part of the Considerate Contactors scheme and always seek to minimise their impact on the surrounding area. If the MIOS scheme were going ahead then detailed plans would be submitted as part of the planning application to monitor and control construction impacts. As we are now pursuing the much less intrusive option of declassifying the reservoir, the construction impact will be very much less.	



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