KFAG's response to the Glenderamakin NFM [National Flood Management]Working Group's May 2021 Update.

We acknowledge the importance of the work that you are doing in terms of our local environment along the Glenderamackin and its biodiversity. Our issue is that in your May update, and other recent communications, you lead and emphasise the flood mitigation benefits without any context on their scale with respect to the reality of risk and flows in the catchment.

RE: Glenderamackin NFM Working Group Update (May 2021). This states that "During the largest (*rain*) event observed, on 26th March 2021, during which properties in Keswick were at risk of flooding, the features took 13,000 m³ off the flood peak at a rate of between 0.1 and 0.23 m³/sec."

Please note the following:

As it turned out Properties in Keswick were not at risk of flooding. The March 2021 event was well within the design criteria for the physical flood defences in Keswick. During that event, the peak flow in the River Greta, just upstream of Keswick, was around 55 m³/sec, making the reduction in peak flow from the 49 NFM projects (costed at around £560k) at between 0.18 and 0.4%. All but insignificant in terms of reducing flood risk to Keswick. To put this in further context the peak overspill from Thirlmere during rain event of 26-29/3/21 was 27 m3/sec (from level of 17.108m at 07:15 on 29/3/21).

To give some further perspective KFAG estimate the town's river defences should be able to cope with 260 to 270 m³/sec flows. The flows at Low Briery during Storm Desmond were 343 m³/sec which included contributions from Thirlmere overtopping by 104 m³/sec. So, with no overtopping at Thirlmere, Keswick, in theory, would not have flooded even under such an extreme event.

Whilst the volume claimed was of no significance, we would be interested to see how you calculated the peak flow benefit?

To fail to acknowledge the reality of the group's minimal "achievements" with regard to flood risk management (especially as it relates to Keswick) is deeply unfair to those who then live with false optimism that their risk is being appreciably reduced. We cannot support – and will continue to call out publicly – biased reporting of NFM achievements for flood risk reduction that are not presented within the context of the scale of the volumes and flows which this steep, mountainous catchment creates. There appears to be either deliberate spin/an unashamed prejudice towards NFM – or that you have no appreciation of the town's actual flood risk.

It is hard to envision NFM techniques that would significantly add to Keswick's protection over that given by the existing defences in any storm large enough (eg another Desmond) to threaten serious flooding. KFAG and the Keswick community are not seeking further concrete defences, just better utilisation of what is already there.

It appears that we are faced with years of agonising over any additional controlled outflows from Thirlmere, which KFAG have demonstrated are needed to create storm space in the reservoir. Thirlmere management to reduce damaging overspills can do more than keep our carpets dry. However, there is no apparent acknowledgement by any other NGO of the damage to the environment/habitats/farmland that results from uncontrolled high flows from overspills, and needs to be factored in to any balanced argument. KFAG needs this to be recognised and asks each organisation for full, collective support for an increased release regime from the reservoir without the bias and clouded vision that apparently exists over NFM.

Regards

Rod Donington-Smith On behalf of Keswick Flood Action Group