



# Communication, Engagement and Consultation Strategy

Flood and Water Management  
Northamptonshire County Council  
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# 1. COMMUNICATION AND ENGAGEMENT

- 1.1. Effective communication is fundamental to promoting better community relations and awareness of flood risk management issues, and encouraging people at risk to take action before and during a flood.

## *Overview of Stakeholder Engagement*

- 1.2. The 1992 United Nations Conference on Environment and Development raised the importance of stakeholder engagement in environmental decisions, and placed it on an official footing, both in Principle 10 of the Rio Declaration and Agenda 21 (the action plan for sustainable development).
- 1.3. The requirements of the Convention for stakeholder participation in projects include:
  - Timely and effective notification of the stakeholders concerned;
  - Reasonable timeframes for participation, including the provision for participation at an early stage;
  - An obligation on the decision-making body to take due account of the outcome of the stakeholders participation.
- 1.4. The European Union Water Framework Directive (WFD) also places an emphasis on stakeholder participation. In England, the Environment Agency is the authority responsible for implementing the WFD. The Environment Agency is required to consult with stakeholders throughout the process, and encourage the active involvement of stakeholders.
- 1.5. One of several recommendations of the Pitt Review was to ensure effective public and stakeholder engagement and a coordinated approach to flooding and water management. This recommendation has now been encompassed within the Flood and Water Management Act (2010), which promotes partnership working and community and stakeholder engagement.

## *General Principles for Engagement*

- 1.6. It has been agreed that the following principles shall apply to all work completed by the County Council:
  - **Principle 1: Engagement is a two-way process.** We will listen to what people have to say and consider this in developing our assessments and strategies;
  - **Principle 2: Engagement will be planned, programmed and publicised.** We will link involvement to those key times when input from stakeholders will be valuable in helping us increase our understanding around flooding and water management and when plans and strategies are being produced;
  - **Principle 3: Engagement will be relevant and practical.** We will ensure that engagement is relevant to the issue and that techniques used are appropriate.
  - **Principle 4: The purpose of the engagement will be made clear.** We will explain clearly and honestly why people are being asked for their views or opinions and how those replies will be taken on board and used.
  - **Principle 5: Responses will be used in an effective manner.** We will be clear about why we used the information from the consultation in the way we have.

## 2. CONSULTATION STRATEGY

### *Engagement*

- 2.1. There is a formal requirement for stakeholder engagement for much of the work undertaken under the Flood and Water Management Act. Stakeholder engagement will take place early on and consultation will be a two-way process.
- 2.2. The County Council will choose methods and processes of engagement to make them as relevant and effective as possible. There is no single 'right' way to engage, many techniques are appropriate, however the way the Council will do this will depend on the targeted stakeholder and the particular objectives of any specific consultation.
- 2.3. The County Council will seek to structure engagement in a way that will genuinely gauge the views of stakeholders. Activists and lobbyists will be listened to, but the Council will not see them as necessarily representative of the cause they seek to promote.
- 2.4. The table below provides information on whom and how the County Council will attempt to consult for all documents produced under the Act.

**Table 2-1: Who and how the County Council will consult**

Who	Who they represent	How to Consult
Elected District/ Borough and County Councillors in Northamptonshire	Local Residents/ Wards	These will be emailed the consultation material and be informed of relevant events specific to the particular consultation and their interest in it, including member workshops/ presentations/cabinet/scrutiny.
Environment Agency	The Secretary of State for Environment, Food and Rural Affairs and deliver the environmental priorities of Central Government	They will be sent details of the consultation material and be informed of relevant events specific to the particular consultation.
Local Resilience Forum	Emergency Planning; Hospitals; Primary Care Trust (PCT); East Midlands Ambulance Service; District/Borough Councils; Environment Agency; Military	These will be informed by letter of the consultation and how they can specifically engage in the process as well as receiving update papers via the County Council Flood and Water Management Framework.
Northamptonshire Public Service Board	Public service organisations	Through the receipt of update papers via the County Council Flood and Water Management Framework.
Internal Departments – County Highways, Environment Unit, Emergency Planning etc.	The County Council	These will be informed by email of the consultation and how they can specifically engage in the process.
Highways Agency	Department for Transport on behalf of the Secretary of State for Transport.	Will be sent copies of the consultation material and be informed of relevant events specific to the particular consultation and their interest in it.

Who	Who they represent	How to Consult
Neighbouring Unitary Authorities/ County Councils	Adjoining area	Will be sent details of the consultation material and be informed of relevant events specific to the particular consultation and their interest in it.
Water Companies	Anglian Water Thames Water Severn Trent	Will be sent details of the consultation material and be informed of relevant events specific to the particular consultation and their interest in it
Parish Councils		Will be sent details of the consultation informing them how they can engage in the process and where they can view the consultation material. Including consultation leaflets & questionnaires.
Residents Associations (list)	Residents	Will be sent details of the consultation informing them how they can engage in the process and where they can view the consultation material. Including consultation leaflets & questionnaires.
'Community Groups' – Organisations	Specific sectors of the community, including older people, people with disabilities, the black and ethnic community, faith groups and the voluntary sector	Will be sent details of the consultation informing them how they can engage in the process and where they can view the consultation material. Including consultation leaflets & questionnaires.
Local interest and pressure groups	Specific members of the public/sectors of the community	Will be sent details of the consultation informing them how they can engage in the process and where they can view the consultation material. Including consultation leaflets & questionnaires.

2.5. When the consultation involves meetings and exhibitions the County Council will hold them in accessible locations and at accessible times of the day for those the consultation seeks to engage with.

### *Stakeholder Involvement Techniques*

2.6. The table below provides a brief summary of a number of techniques that may be appropriate to use in the involvement of stakeholders.

**Table 2-2: Stakeholder involvement techniques**

Methodologies to involve stakeholders	Comments
Questionnaires and Surveys	<ul style="list-style-type: none"> <li>• Structured way of obtaining basic information that can be easily analysed.</li> <li>• Able to reach a large number of people, they are convenient, economic and thus a good starting point.</li> <li>• They need to be well structured and ensure that the questions are not leading.</li> </ul>

Methodologies to involve stakeholders	Comments
Exhibitions	<ul style="list-style-type: none"> <li>• Useful way of presenting basic information and options to the public, especially local communities.</li> <li>• Able to reach large numbers of people if well-advertised.</li> <li>• Allows face to face feedback of information.</li> </ul>
Public Meetings	<ul style="list-style-type: none"> <li>• Enable presentation of basic information to the general public.</li> <li>• Allow large numbers of people to be involved in some limited discussion.</li> <li>• Need to be carefully managed to ensure all views are heard.</li> </ul>
Use of the full range of the media	<ul style="list-style-type: none"> <li>• Engages large numbers of the population, through newspapers and the radio. Useful at reaching those who may be more difficult to involve.</li> </ul>
Workshop/ presentations	<ul style="list-style-type: none"> <li>• Structured group discussions designed to solve problems and identify ways forward. Useful in bringing different groups of experts together.</li> </ul>

### *Identifying Risks and Managing Them*

2.7. When planning engagement exercises, the following risks should be considered:

- Lack of interest, willingness or trust in the exercise, which will lead to a low response rate;
- Lack of understanding of key issues;
- The responses may add little to the debate/ contain insufficient detail;
- The responses received may represent a narrow range of opinion (e.g. if only specific action groups respond);
- The responses may not show consensus about the issues and the possible solutions/conclusions.

2.8. The inevitable differences and conflicts arising from responses to consultations will need careful consideration, weighing up and balancing. The County Council will be clear about why it has used the information gained in the way it has.

2.9. The County Council will build in procedures to monitor and evaluate the effectiveness of its engagement exercises. This will let the Council know whether what it is doing is genuinely helping in the way it listens and responds.

### *Taking Comments into Consideration*

2.10. The County Council will ensure that it uses any comments it receives to really inform the content of its documents. Engagement will not just be a formal 'stage' that has to be undertaken; it will help to shape the County Council's documents.

### **3. CONSULTATION ON THE NORTHAMPTONSHIRE LOCAL FLOOD RISK MANAGEMENT STRATEGY**

- 3.1. The County Council has sought public responses to assist in the development of the Local Flood Risk Management strategy. The public consultation in 2012/13 was undertaken in two phases: firstly a generic consultation to determine priorities and objectives for the Strategy, which was linked to the Northamptonshire Flood Fairs; and secondly a consultation on the draft Strategy.

#### *First Public Consultation Phase*

- 3.2. To help raise flood awareness amongst the public, and to launch the first public consultation on the LFRMS, a series of Flood Fairs were held across the county in partnership with the Environment Agency and Anglian Water. The key aim of the Flood Fairs was to provide the opportunity to:
- Raise awareness of the County Council's new role and responsibilities;
  - Consult with local councils/organisations and the public on the Northampton Surface Water Management Plan;
  - Talk to people about the Local Flood Risk Management Strategy being drafted;
  - Identify and inform of areas at risk of flooding; and
  - Advise people of how they can be prepared for a flooding situation and encourage resilience.
- 3.3. The invitation to attend the fairs went to all Parish and Town Councils, all District and County Councillors as well as all Environmental and Community Groups across the county. The Environment Agency also invited residents located within a flood risk area in the county.
- 3.4. The County Council actively promoted self-reliance with regard to flood risk and staff were on hand to give advice on the preparation of a Flood Emergency Plan for householders, and also more specialist advice on the preparation of a business continuity plan for businesses who might suffer as a result of a disruptive incident such as a flood. Staff were also promoting awareness of the County Council's new roles and responsibilities under the Flood Risk Regulations (2009) and Flood and Water Management Act (2010) and informed people about the consultation on the Local Flood Risk Management Strategy.
- 3.5. Information was available from the Environment Agency on how to prepare community flood plans and personal flood plans, how residents can get involved through the Parish Council flood warden schemes, checking postcodes and encouraging the sign up to Floodline Warnings Direct (a free service that the Environment Agency offer for those that in a flood warning area).
- 3.6. Representatives from Anglian Water were also in attendance to answer questions relating to the Big Sewer Switchover, which took place on 1 October 2011. They were able to provide advice and guidance on specific issues and were also raising awareness about issues concerning fats, oils, greases and unflushables that find their way into the sewers.
- 3.7. The flood fair exhibition brought together a large gathering of flood defence equipment suppliers, manufacturers and specialists. Visitors were able to see at first hand a wide range of products displayed by the exhibitors at the event. The products available showed residents how to protect their homes and businesses from the ingress of water during a flooding incident. These included simple solutions such as "synthetic" sandbags and door guards and air brick covers for homes.

3.8. Nearly 240 individuals attended as follows:

- Forty-seven attendees at Thrapston;
- Sixty-nine attendees at Towcester; and
- One hundred and twenty-three attendees at Northampton.

3.9. Data was collected using interactive mapping, which was projected on a large plasma screen. Alongside the Flood Fairs, opinions were requested on what people regard as priorities as well as collecting information about areas that have experienced flooding within the county in the past. Feedback forms were distributed to enable the public, businesses, Local Authorities and other organisations to submit responses. The feedback form was also available to download from the Flood and Water Management pages of the County Council's website.

3.10. The first consultation phase ran for a three month period. The general themes and content of those responses and how the matters highlighted were addressed within this strategy have been set out below.

**Table 3-1: First Phase Consultation Responses on the LFRMS**

Question	Consultation Response	Northamptonshire LFRMS
1. Having now had the opportunity to view the information on the County Council's website and to attend a Flood Fair, are there any additional subject areas that you feel should be included in the Local Flood Risk Management Strategy?	a) Yes, particularly villages previously affected by flooding and how to prevent further events.	a) The strategy will identify the highest risk areas in the county and provide property level resilience and resistance advice.  Including sign-up to flood warden, flood warning scheme and it will also identify the need for potential flood defence schemes.
	b) The strategy needs to set out insurance measures and what is and is not covered.	b) It is not the strategy's place to be specific about insurance measures but will provide advice on the where to go for further information.
	c) The coverage of subjects appears to be comprehensive.	c) N/A
	d) Consider that there should be greater publicity of the role and responsibilities of riparian owners in the management of flood risk.	d) More information has been provided on the NCC flood and water management webpage. The roles and responsibilities will also be clearly set out in the LFRMS.
2. What flood or water management alleviation schemes do you think should be included in the strategy?	a) In built up areas there is poor road drainage. In rural areas there is neglect of drains and ditches and the infrastructure in particular is not keeping up with new building.	a) The LFRMS will set out the maintenance regime currently in place and the proactive initiative of the gully clearing regime.
	b) The drains and culverts should be on regular maintenance programmes.	b) N/A

Question	Consultation Response	Northamptonshire LFRMS
	c) Brooks and streams in residential areas should be cleared and regularly maintained.	c) This is a riparian owner issue and the roles and responsibilities will be clearly set out.
	d) Notice given prior to gully gushing to ensure vehicles don't block storm drains.	d) N/A
	e) Clearing all the surface and storm drain channels of rubbish and blockages immediately before floods occur.	e) N/A
	f) Management of smaller brooks and waterways should be covered by this plan, which if blocked can have a significant impact on the drainage of water.	f) N/A
	g) More regular inspections of drainage systems required.	g) The will continue to be prioritised on a risk basis. The process for reporting any issues will be clearly set out in the LFRMS.
3. How should reducing the flood risk to people, property, business and the environment be prioritised?	a) Pressure should be placed on farmers to keep ditches in good condition for the purpose of improving water storage or run off from fields and conducting away excess water in a more controlled manner rather than washing over adjacent roads.	a) Riparian owner responsibilities will be clearly set out in the LFRMS.
	b) The elderly, young, handicapped should be prioritised.	b) This has all been factored into the priority grading risk methodology.
	c) Greatest priority must be given to areas where life is endangered but more concern must also be given to addressing the potential impact of new developments in a catchment area.	c) N/A
	d) Priority should be given to life and then property, business and environment.	d) As above
	e) Emergency funding should be put aside for assisting those affected.	e) Adequate insurance should be sought by home and business owners. Funding generally is covered in the LFRMS.
	a) Yes, much clearer now.	a) N/A

Question	Consultation Response	Northamptonshire LFRMS
4. Different organisations have different responsibilities for managing flood risk. Are these roles now clear? If not, how could they be made clearer?	b) Roles are clear enough. The acid test is whether the organisations actually take action rather than studying and talking about the problems. There is also a need for greater clarity over riparian responsibilities where there is complex ownership.	b) Roles and responsibilities will be clearly set out in the LFRMS.
	c) No clearer than before the flood fair.	c) N/A
	d) Very blurred, nobody admits to it yet always prepared to put the blame onto others. Get the drains cleared properly then blame politicians for NOT doing it – typical political approach.	d) N/A
	e) There should be better cooperation between Highways Departments and Anglian, Severn Trent and Thames Water.	e) The partnership working approval will be set out in the LFRMS – all organisations set out are partners.
5. Are you or your council/ organisation involved in any flood risk management activity? And if so what?	a) Yes, we have the Emergency Planning group and we try to inform the organisations what is wrong in an attempt to make improvements.	a) This good work will be highlighted within the LFRMS.
	b) Yes, an active flood warden trying to get action out of the County Council.	b) N/A
	c) The Parish Council has no responsibility in this area so it is left to individuals to take action.	c) Promotion of flood warden schemes and community flood plans will be included.
	d) No. All local councillors are ignorant of duties and responsibilities.	d) N/A
	e) Personal examination of potential water blockages.	e) N/A

### *Second Public Consultation Phase*

- 3.11. Once the draft Strategy had been agreed by all partners, the full report and accompanying documents were published for consultation online on the Flood and Water Management pages of the County Council's website. A feedback form was provided on the website for responses. Opinions were requested on each section of the Strategy, plus specific views on each of the Objectives, the actions within the Action Plan, whether there were any additional actions that could be included, and requests for further information regarding historic flood incidents that have not been previously reported.
- 3.12. The public consultation ran for three months, ending on Thursday 28 February 2013. The general themes and content of those responses, and how the matters highlighted have been addressed within this Strategy have been set out below. All comments received

were analysed and minor changes made to the Strategy as a result. This 'living document', was taken to Cabinet for full approval on the 8th October 2013.

- 3.13. The action plan has since been updated annually and the full strategy has recently been reviewed after three years and was subject to public consultation from 16<sup>th</sup> June 2016 to 28<sup>th</sup> June 2016. The correspondence comments received to this public consultation, response from the Lead Local Flood Authority on each comment and proposed amendments are displayed in Table 3-2.

**Table 3-2: Second Phase Consultation Response Form**

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
Canal and River Trust	01	All			I have scanned the documents for references to 'canal' and do not have any comments to make.	Noted	No change.
Braunston Parish Council	02	N/A			Recent flooding proximal to the Marina demonstrated a managed and rapidly receding amount of flood water.	Specific flood incident	Incident has been mapped on the hotspot register.
Historic England	03	SEA Part 2	12	Table 3-1	Non-designated heritage assets should be included within the 'Landscapes and Historic Environment, including cultural, architectural and archaeological heritage' Environmental Topic of Table 3.1, 'scoped in' column.	Agree.	Add: Non-designated heritage assets.
Historic England	03	SEA Part 2	21	3.32	Non-designated heritage assets should also be included within paragraph 3.32.	Agree.	Add: Non-designated heritage assets.
Historic England	03	SEA Part 2	21	3.34	Detail risk of fluvial flooding and surface water flooding within paragraph 3.34.	Agree.	MapInfo query re-run for non-designated assets: In Northamptonshire, there are 65 Scheduled Monuments, 2 Historic Battlefields, 67 Conservation Areas, 226 Listed Buildings and 5,862 other non-designated heritage assets at risk of fluvial flooding.

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
							There are 114 Scheduled Monuments, 3 Historic Battlefields, 177 Conservation Areas, 792 Listed Buildings and 13,044 other non-designated heritage assets at risk of surface water flooding.
Historic England	03	SEA Part 2	21	3.35	Detail risk of fluvial flooding and surface water flooding within paragraph 3.35.	Agree.	See above.
Historic England	03	SEA Part 2	29	Table 4-1	The SEA topic 'Cultural Heritage' within Table 4-1 is strongly welcomed. It would be beneficial to insert <i>designated and non-designated</i> in brackets after 'heritage assets' in the first column to further strengthen this section.	Agree.	Add: (designated and non-designated).
Historic England	03	SEA Part 2	29	Table 4-1	The Landscape section within Table 4-1 would benefit from inclusion of reference to 'historic landscape character' as identified in the HLC, part of Northamptonshire ECA, and in line with the European Landscape Convention, townscape character, e.g. as identified in Conservation Area Appraisals.	Agree.	Include: reference to historic landscape character as an example.
Historic England	03	SEA Part 2	39	Appendix 1	Within Appendix 1, reference to the North Northamptonshire Joint Core Strategy and the West Northamptonshire Joint Core	Agree.	Add: together with the Part 2 Local Plans.

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
					Strategy, together with Part 2 Local Plans where available would strengthen the 'Plans, Policies and Strategies of Relevance' column. Conservation Area Appraisals could also be included at this point.		
Historic England	03	SEA Part 3			The comments applying to LFRMS, SEA Part 2 are also relevant to this document.	Noted.	Amend in line with comments.
Historic England	03	SEA Part 4	6	Box 1.1	The comments above in relation to Part 2 are also relevant to this document, such as in relation to the 'Objectives of the Northamptonshire LFRMS' within Box 1.1.	Agree.	Amend in line with changes to Part 2. SEA and LFRMS.
Historic England	03	SEA Part 4	9	Table 3-1	The comments above in relation to Part 2 are also relevant to this document, such as in relation to the 'Objectives of the Northamptonshire LFRMS' within Box 1.1.	Noted.	Amend in line with comments.
Historic England	03	SEA Part 4	11	3.14	The comments above in relation to Part 2 are also relevant to this document, such as in relation to the 'Objectives of the Northamptonshire LFRMS' within Box 1.1.	Agree.	Amend in line with comments.
Historic England	03	LFRMS	2	1.7	Whilst objective 3 within paragraph 1.7 is welcomed; reference to heritage assets should be included within the non-bold section such as:-	Agree.	Amend in line with comments.

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
					<i>“3. Enhance the Natural and Historic Environment – Adopt a sustainable approach to reducing local flood risk, seeking to lessen the risk of localised flooding using mechanisms that are economically viable, deliver wider environmental benefits conserving and enhancing heritage assets and their settings and promote the wellbeing of local people.”</i>		
Historic England	03	LFRRMS	40	Objective 3	Reference to objective 3 on page 40 should be updated to reflect proposed amendment to Paragraph 1.7	Agree.	Amend in line with comments.
Historic England	03	LFRRMS	41	6.3.3	Reference to historic assets within the fourth bullet point of 6.3.3 is supported; <i>historic</i> should be amended to <i>'heritage'</i> to more closely reflect the NPPF. A paragraph on the wealth and importance of heritage assets within Northamptonshire would be beneficial to illustrate their importance.	Agree.	Add sentence: “there are a wealth of heritage assets in Northamptonshire which are of great importance.”
Badby Parish Council	04	Northamptonshire LFRRMS-Report-public-	20	3.38	As Badby Parish Council, we have concerns at the likely effectiveness of the policy and actions at our level. The Nene rises in the parish but is not a Main River at this point; it is fed by several brooks running	Noted.	There are letter templates available on the <a href="#">Flood Toolkit here</a> (see Community and Landowner Guidance/ Parish/Town Council Flood Letter

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
		consultation-draft-2016			through the parish and village areas. The hilly nature of the area leads to considerable run-off from ground water and underground watercourses. Over the years a good number of land drains have been laid but we are unable to locate any mapping of them.		Template 1 and 2), which the Parish council can send out to resolve these sorts of problems.
Badby Parish Council	04	Northamptonshire Local Flood Risk Management Strategy – Public Summary	3	n/a (Section heading: Roles and Responsibilities)	There have been several instances of flooding from those brooks, caused by debris, blockages, excess run-off and inadequate culverts under roads. Areas of public Greens are frequently boggy and wet. Our greatest problem, however, is to find anyone who will take overall responsibility for dealing with the problems. Your documents make very clear the large number of organisations that are involved in one way or another, and our Parish Clerk has spent many fruitless hours contacting different authorities to attempt to find out who can deal with issues.	Noted.	Quite often these matters relate to private land, the responsibility for flooding will therefore be with the landowner from which the source of the flooding originates. There is a vast amount of information on our online Flood Toolkit, particularly relating to rights and responsibilities in relation to flooding, how to report flooding incidents and what to do in an emergency. The County Council has recently launched a competition for communities at risk of flooding.
Badby Parish Council	04	9.Roles-of-parish-councils-			While the policy is right in recognising this situation and seeking better coordination, we find little sign of achieving it.		The Pathfinder II Project's aim is to facilitate community-led improvements in resilience and

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
		and-communities			Responsibilities, particularly the intersection of areas of responsibility, are not well defined (certainly to those, like us, who are not expert in these matters). Ultimately, a single central point of contact is required, from which any coordination of, and multi-organisational action by, the many agencies can be delivered. It is unrealistic to believe that bodies like ours can do this.		preparedness amongst communities who are at risk of surface water flooding in Northamptonshire, complementing other flood risk management activities. The project aims to meet the following objectives: The promotion of flood resilience to communities in Northamptonshire To support up to 30 communities through the implementation of small scale asset identification and improvement works, such as CCTV surveys. The deadline is <b>the 9th September 2016 and more information can be found here:</b> <a href="http://www.floodtoolkit.com/how-to-guides/run-partnership-scheme/">http://www.floodtoolkit.com/how-to-guides/run-partnership-scheme/</a> .
	05	Northamptonshire-LFRMS-	19	3.33 and 3.34	The LFRMS states Highways England's duties as a Risk Management Authority and states:	Noted.	

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
		Report-public-consultation-draft-2016			<p>“Highways England (HE) are responsible for the following roads in Northamptonshire: M1, A5, A43, A45, A14 and the M45. Where motorways or trunk roads are identified as being at risk from flooding, contingency plans are prepared to warn road users and, where necessary, divert them away from the problem. Where possible, weather data from the Met Office is analysed and if intense rainfall events are forecast in sensitive flood areas, suitable warnings are posted using the variable message signs.”</p> <p>This comment is judged to be correct and acceptable to Highways England.</p>		
	05	LFRMS-public-summary-June-2016	3	Last bullet point	Highways England is incorrectly referred to as the “Highways Agency”.	Noted.	Amend to Highways England.
	05	NCC-LFRMS-ActionPlan-June-2016-Update	3	Second row in table	<p>Highways England is incorrectly referred to as the “Highways Agency”.</p> <p>The HE is identified as a Risk Management Authority partner / stakeholder – this is welcomed.</p>	Noted.	Amend to Highways England.

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
	05	NCC-LFRMS-SEA-Part3-Assessment-June-2016-update	11	Funding and Prioritisation Row of table	<p>Highways England is incorrectly referred to as the “Highways Agency”.</p> <p>The HE is identified as a potential partner for funding contribution where mutually beneficial Outcome Measures can be gained. This is welcomed as given the HE is a RMA there is a duty to work with partners where possible under the Flood and Water Management Act.</p>	<p>Noted.</p> <p>Noted.</p>	Amend to Highways England.
Highways England	06	LFRMS-public-summary-June-2016	6	Objective 2	Could Objective 2 reference education? It is important to inform the public on flood risk management schemes that are being undertaken locally, along with the reasons why that method has been chosen, and what benefits this will bring.	Noted.	None. The objective is about education: “Develop a <b>greater understanding</b> of local flood risk by <b>improving</b> the scope of <b>local knowledge</b> and <b>understanding</b> of current and future local flood risks”. Although the word education is not specifically mentioned, this is what is implied.
Highways England	06	LFRMS-public-summary-June-2016	7	Objective 6	The actions proposed in Objective 6 seems quite short-term and don’t really mention being economically sustainable for long-term projects or issues which might arise in the future. An annual programme of works	Noted.	All capital projects are listed in the associated action plan and have longer timescales for delivery and planning where required.

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
					is mentioned but some schemes may need to be planned for longer than a year to ensure the project is viable economically. Some examples where this may be the case could be: catchment sensitive farming techniques to provide flood relief- could be a large / complex scheme involving lots of people, taking several years to achieve a successful outcome, or upland heathland creation to hold water in upland areas- may take a while to establish / see benefits.		
Highways England	06	LFRMS-public-summary-June-2016	7	Objective 7	Objective 7 would bring benefits regarding flood risk, by allowing flood relief works to be done more quickly, whilst involving the community so they understand which flood management techniques are effective in their location. There may be some problems with this however: <ul style="list-style-type: none"> <li>Whilst an individual may be responsible for their land, it is important to also consider the catchment as a whole. For example whilst dredging in one area may give short-term flood relief, it may cause issues downstream with flooding / erosion in another area.</li> </ul>	Noted.	Add sentence to reflect that: private owners have a responsibility for their land, as long as they are correctly consulted and are adhering to policy and legislation.

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					<ul style="list-style-type: none"> <li>Private owners may not understand how to effectively manage their land / legislation etc. and so in-depth advice is likely to be needed from organisations, like the EA, to ensure the land is managed properly- this could be impractical and costly.</li> <li>Therefore, the objective should place more emphasis on the private owners having more responsibility for their land, as long as they are correctly consulted and are adhering to policy and legislation.</li> </ul>		
Highways England	06	LFRRMS-public-summary-June-2016	General	-	Whilst the beginning of the summary is quite basic- defining types of flooding, roles and responsibilities of different groups etc., the objectives then become quite complex. For example, the mention of the Water Framework Directive, Surface Water Management Plans, Habitats Regulation Assessment etc. Perhaps a reference is needed in the report to explain what these are?	Agree.	Add more context or remove technical references.

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
Highways England	06	NCC-LFRMS-ActionPlan-June-2016-Update	General	-	Whilst the public summary defines all different types of flooding, the Action Plan states that Northamptonshire LFRMS will target flooding from surface runoff, groundwater and ordinary watercourses. Perhaps these should be defined in the public summary instead to be clear and consistent?	Disagree.	The public summary already covers this on page 3.
Highways England	06	NCC-LFRMS-HRA-Screening-June-2016-update	14	3.26	Nene Washes: 11km2- should just be 11km?	Disagree	This is a footnote reference that has been moved to the end of the sentence.
Highways England	06	NCC-LFRMS-HRA-Screening-June-2016-update	22	Table 8	Welland and Nene Property Level Protection: instillation needs changing to installation	Agree.	Amend.
Highways England	06	NCC-LFRMS-SEA-Part2-Screening-	23	3.48	Environmental Agency needs changing to Environment Agency. Flood event return periods would be useful.	Agree. Noted.	Amend. Add return period reference.

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
		June-2016-update					
Highways England	06	Northamptonshire-LFRMS-Report-public-consultation-draft-2016	34	Table 6.1	<p>NSO 'Avoiding inappropriate development...': The NPPF could be mentioned in 'key themes'.</p> <p>Generally the whole table is quite focused on 'building' flood defences and looking after defence assets. There should be more references to softer flood defences such as allowing upland areas to store water.</p> <p>NSO 'Increasing public awareness...': This point doesn't stress that the appropriate action should be taken to protect material assets- whilst still considering the environment and ecosystem services that can provide resilience to flooding. There should also be a reference to education on flood risk management techniques so the public understand how they will be effective in their area. This is important as while a strategy objective is to 'encourage homeowners and businesses to better protect their properties', misunderstanding</p>	<p>Agree</p> <p>Disagree</p> <p>Agree</p>	<p>Reference to NPPF included.</p> <p>Already included – SuDs.</p> <p>Added reference to “sustainable manner” and linked to Flood Toolkit guidance</p>

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					could lead to ineffective management being undertaken / pressure on agencies.		
Natural England	07	LFRMS			<p>Natural England supports Objective 3: Enhance the Natural and Historic Environment. We welcome the flood risk management options, such as upstream flood storage, as these can have significant biodiversity enhancements and contribute to green infrastructure (GI). This also links into the provision of Blue and Green infrastructure.</p> <p>Blue and Green Infrastructure can be designed to maximise the benefits needed within the LFRMS. The following case studies demonstrate how it can be used to:</p> <ul style="list-style-type: none"> <li>Promote opportunities for recreation, improve links between communities and enhance flood-water management to protect surrounding homes and businesses – <u>Tees Heritage Park</u></li> <li>Adapt the park and surrounding area to climate change, improve flood water management, thereby</li> </ul>	Noted.	Link to good case studies where green/blue infrastructure is mentioned.

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
					<p>protecting local homes and businesses – <u>Mayesbrook Park</u></p> <ul style="list-style-type: none"> <li>• Improve flood water management, create a sense of place, reduce atmospheric pollution and enhancing biodiversity – <u>Greening for growth in Victoria</u></li> <li>• Remediate unused and redundant quarry sites, protect historic and industrial heritage resources, develop cultural and educational facilities and improve local recreation and leisure opportunities – <u>Portland Quarries Nature Park</u></li> </ul> <p>Additional information can be found on the Natural England <u>web pages</u>.</p>		
Natural England	07	LFMS			<p>We are pleased to see the use of sustainable urban drainage systems (SUDS), which can offer benefits for biodiversity and amenity value. We would also welcome retrofitting SUDS, which can reduce or in some cases replace the need for a whole new scheme, in some built up areas.</p>	Noted.	This additional detail is provided in the local SuDs standards.

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Natural England	07	SEA			<p>Natural England agrees with the objectives, baseline and scope of the SEA. We agree that the methodology used to determine impacts and mitigation is acceptable.</p> <p>The potential indicators for monitoring the natural environment are clear and appropriate (SEA Environmental Report Part 3, table 5.1 p28); however the plan still does not include any procedures for addressing adverse effects revealed by monitoring or for remedying at an early stage, unforeseen adverse effects caused by the plan. This is a requirement of the SEA Regulations and therefore we would recommend that Northamptonshire County Council provide this information. We refer you to our letter of 27th February 2013, where we initially raised this point.</p>	<p>Noted.</p> <p>Agree.</p>	Added into Section 5 of SEA Part 3
Natural England	07	HRA - Updated Screening Report			Our comments on the HRA are the same as our previous response, as the results have not changed. Natural England agrees with the conclusions of the report, i.e. that a likely significant effect of the Local Flood Risk Management Strategy (LFRMS) on	Noted.	

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
					Upper Nene Valley Gravel Pits SPA/Ramsar site cannot be ruled out at this stage. However, we appreciate that due to the high level nature of the LFRMS, it is not possible to determine the significance of impacts at this stage before scheme designs, and mitigation measures etc. are known. We agree that any scheme arising out of the strategy which has been identified in Table 8 of the HRA should be subject to a project-level HRA in order to fully evaluate any impacts on the designated site and to ensure appropriate measures are in place to avoid any adverse effects on integrity.		
Natural England	07	HRA - Updated Screening Report			We agree with the screening out of other European sites located in neighbouring counties, as not being likely to be significantly affected by the LFRMS.	Noted.	
Environment Agency	08	NTS		3.15	Typo – ‘waster sites’	Agree.	Amend
Environment Agency	08	LFRMS	9	Map 2	Typo – should be Gretton Brook. Add labels for Welland and Jordan	Agree. Agree.	Amend. Add.

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
Environment Agency	08	LFRMS	16	3.8	The water companies boundaries overlap which is not captured on the map referenced e.g. AWS provide water supply to parts of Daventry whereas Severn Trent provide foul drainage. Please see <a href="http://www.anglianwater.co.uk/about-us/anglian-water-and-you.aspx">http://www.anglianwater.co.uk/about-us/anglian-water-and-you.aspx</a> . It would be useful to include this information for the Northamptonshire Councils within the appendices.	Noted	This strategy looks at flood risk and not potable water supply or foul. Therefore only surface water drainage responsibilities have been presented.
Environment Agency	08	LFRMS	19	3.27	Expand on 'The Environment Agency is also responsible for providing advice to planning authorities, providing fluvial and coastal flood warnings, monitoring flood and coastal erosion risks and supporting emergency responders when flooding occurs.'  Environment Agency's objectives and contributions to sustainable development: 'In support of its objectives the Agency is involved with land use planning, including advising on regional planning guidance, development plans and planning applications. Its primary role subject to any	Agree.	Add/expand.

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
					<p>changes in the light of the Planning Green Paper, is to advise on those aspects of draft plans, planning applications, environmental statements and hazardous substances consent applications which relate to its operational functions and particular expertise, using information it already has.</p> <p>The Agency also has a role in providing advice at an early stage in the planning process; both to help shape development briefs and draft plans before they go out to consultation; and to advise prospective applicants on the potential implications of their proposals before an application is made to the local planning authority. If the Agency considers there are gaps in a planning authority's draft plan or appraisal of an application from the wider sustainability point of view, it should draw the authority's attention to this. Where the Agency provides advice it should do so in a timely, consistent, justifiable and understandable way.' (DEFRA, 2002, para 5.3).</p>		

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
					<p>We are a statutory consultee on a number of types of development, for the purposes of responding on planning application consultations from LPAs and pre-planning application enquiries from developers. In addition, we provide consultation responses on some types of development on which we are not a statutory consultee. Table A1 indicates the development types on which we were a statutory consultee. Our external Consultation list sets out the types of planning consultations the Environment Agency wishes to be consulted on in England:</p> <p><a href="http://www.rbwm.gov.uk/pam/docServlet?docId=138076255&amp;filename=1929546.pdf&amp;imeType=application/pdf">http://www.rbwm.gov.uk/pam/docServlet?docId=138076255&amp;filename=1929546.pdf&amp;imeType=application/pdf</a></p> <p><a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/538888/160715_Environment_Agency_21_day_report_2015-16_final_amended.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/538888/160715_Environment_Agency_21_day_report_2015-16_final_amended.pdf</a> (Page 20)</p>		
Environment Agency	08	LFRMS	31	Table 5.2	<p>Enterprise Zone + LDOs</p> <p>Of note is that a number of the wards identified as being at the highest risk are within the Northampton Enterprise Zone</p>	Disagree.	

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
					(EZ) of which there is no reference to. It should be noted that the EZ will comprise of a number of Local Development Orders (LDOs) which will replace the need for planning applications. This report makes reference to a number of assessments to support planning applications but fails to include guidance on the requirements regarding flood risk for any proposals within the EZ that will not require planning permission due to the relevant LDO.		Reference included elsewhere but prioritisation assessment does not include EZ and LDOs.
Environment Agency	08	LFRMS	40		There is a reference to 'catchment plans' but it is not clear exactly which plans this means or whether it is a generic term for all plans or an approach that is being taken.	Agree.	Removed.
Environment Agency	08	LFRMS	44	Increased Tree Coverage	Increased Tree Coverage should mention the Rockingham Forest for Life initiative.	Agree.	Add.
Environment Agency	08	LFRMS	46	6.4.8	Hyperlink should read Floodline Warnings Direct.	Agree.	Amend.
Environment Agency	08	LFRMS	62	FRMP	Missing 'Plan' – now also a bit confusing with Flood Risk management Plan on the following page.	Agree.	Delete second reference.

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
Environment Agency	08	LFRMS & Action Plan			There is no reference to the Local Nature Partnership - the LNP area matches the County boundary. There is a significant amount of established partnership work being undertaken (building on relationships formed through previous national growth plans) to support growth & ensure the environment is protected/ enhanced in Northamptonshire, it could be useful to show this partnership working using the diagram found in appendix 1:	Agree	Included a reference under 6.3.12
Environment Agency	08	LFRMS & Action Plan		Infrastructure Delivery Plans	It is important that both the West Northamptonshire and North Northamptonshire Infrastructure Development Plans (IDP) are referred to. In order to seek developer funding where considered appropriate and necessary the LFRMS could include an ongoing action under Objective 6 – Economically Sustainable Approach to ensure that when information/studies become available, any schemes, including their costs, are identified and added to the IDP or Community Infrastructure Strategy	Agree	Included at 6.6.14

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
Environment Agency	08	LFRRMS & Action Plan		Green Infrastructure Plans	<p>Reference should be made to local Green Infrastructure Plans. The Action Plan could include projects identified within the GIPs where there are also flood reduction benefits. For example the draft Northampton GIP has identified several GI/flood risk projects</p> <ul style="list-style-type: none"> <li>a) Brampton Arm*</li> <li>b) W. Nene, Upton &amp; Duston Mill</li> <li>d) Town Centre Waterside</li> <li>f) Washlands &amp; E. Nene</li> <li>g) Urban brook corridors</li> </ul> <p>We note the inclusion within the Action Plan of the Green Infrastructure Strategy for the Slade Brook.</p>	<p>Agree.</p> <p>Noted</p>	Reference GIP now added to LFRRMS and Action Plan.
Environment Agency	08	Action Plan	Page 3 onwards	Aim	<p>Slight edit (important dressing) to the table title. Could the word 'Benefits' be added to the Aim, so that it reads – Aim/Benefits? I think this is already partially described and more partners may be compelled to progress delivery where benefits are listed. In similar fashion 'further reference' to Source of information, making it Source of information/further reference. This will enable cross referencing and complement</p>	Agree	Added

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
					the list of projects put forward in the adopted JCS infrastructure delivery plans.		
Environment Agency	08	LFRMS/Action plan	34	STRATEGY OBJECTIVES FOR MANAGING LOCAL FLOOD RISK	<p>It may be useful to explore the details in the table to ensure that the style in objective 1 is duplicated across the objectives:</p> <p>Objective 1 – Collaborative approach</p> <ul style="list-style-type: none"> <li>- Explore opportunities for future engagement events (further reference anywhere to show what the rate of progress is on this, who has or will benefit from this, and in what order?)</li> <li>- Promote partnership working, maintaining communication btw all parties (any reference documents to show how this is being done, whether there are gaps, what is required, detailed report found elsewhere?)</li> </ul>	Noted	
Environment Agency					<p>Just a question building on our governance comments and the structure I sent through to you:</p> <p>Is there scope to consider how the LNP and other interested partners could deliver objectives of the LFRMS &amp; Action Plan in an efficient and coordinated manner</p>	Noted	

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					<p>(Objective 1 Collaborative approach: making them more economically viable and where there's cross-over with other schemes i.e. highways<sup>[1]</sup> - environmentally viable)?</p> <p>The majority of issues / partners I was thinking of are represented in form or another as partners (some more active than others) of the LNP or SWMP groups: agriculture, H&amp;WB, Water Co.'s, Heritage &amp; tourism<sup>2</sup>, Minerals, BAP.</p> <p>With the exception of transport<sup>2</sup> (linked to this could an edit be made to update any reference of Highways Agency to Highways England).</p> <p>Feels as though there's still more that could be done to promote partnership working, improve communication between all parties e.g.</p> <ul style="list-style-type: none"> <li>- making priority schemes/activities to address the top 15 'at risk' wards more visible</li> <li>- highlighting areas where there's a shortfall in funding; or</li> </ul>		

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					<ul style="list-style-type: none"> <li>- opportunities for partnership working / co-delivery i.e. supportive of the aspiration of Increased tree coverage / natural alleviation across the county. This doesn't however only provide benefit for flood risk management – consideration needs to be given as to how might we best progress this in a collaborative manner across the county (build on <u>NIA ecosystem services mapping?</u>).</li> <li>- Would there be any benefit in for example embedding these priorities into various strategic plans: LEP strategic economic plans, catchment plans, GI Implementation plans etc.?</li> <li>- The Local Nature Partnership support this (in theory?) by ensuring that the relationship between society and the economy with the environment is recognised in making decisions and setting priorities (based on sound environmental evidence).</li> <li>- Preparedness and resilience<sup>3</sup> has links to LEPs re: productivity<sup>4</sup> (scope for future LGF bids etc.).</li> </ul>		

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					<p><sup>[1]</sup> See <i>Review of Literature – how transport’s soft estate has enhanced green infrastructure, ecosystem services, and transport resilience in the EU</i><sup>2</sup> Tourism provides 7.1% of total jobs across the South East Midlands area, so is a big employer, but with potential to expand (Office for National Statistics, website, 2012)</p> <p><sup>3</sup> Extreme weather is by far the most common cause of business disruption, above IT loss, loss of staff, telecommunications and utilities failures (Chartered Management Institute 2012)</p> <p><sup>4</sup> High quality natural environment enhances labour productivity (see <i>Microeconomic Evidence for the Benefits of Investment in the Environment 2 (MEBIE2)</i>)</p>		
Environment Agency	09	HRA Screening and Scoping Report	3	1.11	<p>Typo halfway through paragraph: “...and it is essential for Imperative Reasons for Overriding Public Interest (IROPI)...”</p> <p>Substitute ‘for’ with ‘of’.</p>	Agree	Amended in line with comments.
Environment Agency	09	HRA Screening	28	Table 9	Referencing the second bullet point: “ <i>With particular reference to any dependent</i> ”	Agree	Re-structured to link with previous bullet point.

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		and Scoping Report			<p><i>component special interest features for which the land is designated- Counter Drain/Old Bedford (outer river) and the Old Bedford/River Delph (inner river) and spined loach."</i></p> <p>This 2nd bullet point in this column for each site isn't a conservation objective - should be re-phrased for clarity.</p>		
Environment Agency	09	HRA Screening and Scoping Report	28	Table 9	<p>Two suggested word changes:</p> <p><i>"...objectives of the European site as this sites is over 10km away..."</i></p> <p>Substitute for 'site'.</p> <p><i>"...River Nene, it is adjudged improbable that the measures..."</i></p> <p>Substitute for 'judged'.</p>	Agree	Amended in line with comments.
Environment Agency	09	HRA Screening and Scoping Report	30	3.85	<p>Two amendments:</p> <p><i>"...LFRMS are set out in Appendix 2 of this report and include..."</i></p> <p>Should be 'B'.</p>	Agree	Amended in line with comments.

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
					<p>Bullet point two: -</p> <p><i>“...River Basin Management Plan (RBMP) for the Rivers Severn and Thames...”</i></p> <p>'Plans' - and also include the Anglian RBMP (realise this list isn't exhaustive and that the Anglian RBMP is included in Appendix B to this report, but the reader wonders why it isn't recognised here..</p>		
Environment Agency	09	HRA Screening and Scoping Report	31	4.2	<p><i>“...when it could potentially undermine the conservation objectives of the features for which...”</i></p> <p>or disturb/ affect designated interest features of that site.</p>	Agree	Amended in line with comments.
Environment Agency	09	HRA Screening and Scoping Report	31	4.9	<p>Amendment at very end of paragraph:</p> <p><i>“...any potential likely significant affects.”</i></p> <p>'effects' at this strategic stage'.</p>	Agree	Amended in line with comments.
Environment Agency	09	HRA Screening	32	4.10	<p>Amendment at very end of paragraph:</p>	Agree	Amended in line with comments.

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
		and Scoping Report			<p>“...assessment in the form of a HRA.”</p> <p>Should replace this text with 'including' a HRA.</p>		
Environment Agency	09	HRA Screening and Scoping Report	32	4.11	<p>Amendment at very end of paragraph:</p> <p>“...integrity of European site are avoided.”</p> <p>'sites'</p>	Agree	Amended in line with comments.
Daventry Town Council	10	All (General comments)			There are too many unlinked documents rather than one consolidated presentation. 647 pages spread over 9 documents makes it very difficult to understand and give beneficial critique.	Noted.	
Daventry Town Council	10	All (General comments)			Please consider publishing a 'tracked change' version to enable a reviewer to easily identify changes made since the original, 2013, document.	Noted.	
Daventry Town Council	10	All (General comments)			One document was flagged by anti-virus software as an 'infected' document and a potential risk!	Noted.	
Daventry Town Council	10	All (Developin			The NCC accepts responsibility to coordinate the management of local flood	Noted.	

Organisation	Response Reference Number	Document	Page Number	Paragraph Number	Consultation Response	Lead Local Flood Authority Response	Proposed Amendment
		g understanding)			risk from surface water, ground water and ordinary watercourses but neglects to consult effectively with local (Parish) bodies. The consequence of this lack of efficient communication results in a failure to “develop a greater understanding of local flood risk by improving the scope of local knowledge and understanding of current and future local flood risks”.		
Daventry Town Council	10	All (Surface water flooding, Sewer flooding & Snowmelt flooding)			Whilst accepting that there are areas in the county that may be at greater flood risk than the town of Daventry it may be that the risks to the Town have been under appreciated. The Town Council has concerns with a local potential risk of pluvial flooding caused by a failure on the part of other bodies, designated Risk Management Authorities, to properly discharge their duties or to conduct proper or routine inspection and maintenance. The continued concentration of development on the Town causes, and has the potential to prevent rainfall from draining away naturally and therefore increasing the risk of flooding from rainwater runoff. This can be evidenced when during a recent downpour	Noted.	

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					surface water in the Town centre was ankle deep for over an hour proving drainage in parts of the Town centre as being inadequate.		

Diagram included as part of a public consultation response from the Environment Agency in Table 3-2

