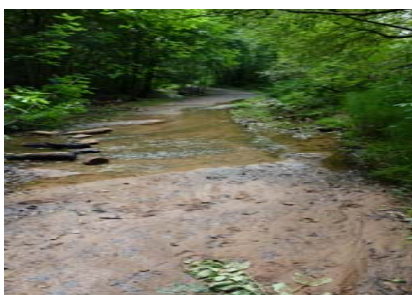
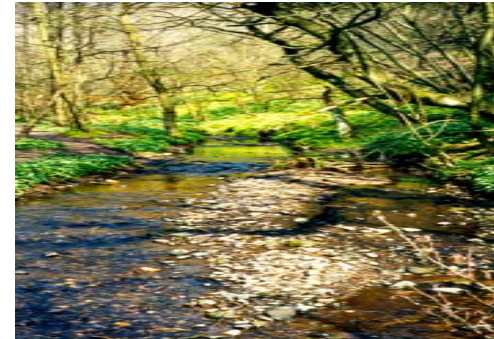


Draft Local Flood Risk Management Strategy Responses Report



Introduction

- 1.1 This document sets out the consultation that was carried out on the draft Local Flood Risk Management Strategy (LFRMS), the representations received and the Council's response to those representations.
- 1.2 The LFRMS was published as a draft for a 6 week period from the 2nd September to the 14th October 2014.
- 1.3 The consultation processes included a press release which advised residents of the public consultation period, placing copies of the Strategy at the Planning Reception in Knowsley Place and the Town Hall. The Strategy and a summary newsletter were made available to view and download from the Council's website. An article was placed in the Planzine e-newsletter and social media was utilised. In addition, presentations were made to the Borough's Township Forums in September and direct emails were sent to:
- Key Land Owners;
 - Business Groups;
 - Key Stakeholders;
 - Risk Management Authorities; and
 - AGMA and adjoining districts
- 1.4 A total of 11 representations were received on the LFRMS Consultation Draft. Table 1 below shows details of the respondents.

Table 1: LFRMS Consultation Draft respondents

Organisation
AGMA
United Utilities
Friends of Nuttall Park
Greenmount Community
Environment Agency
Manchester Fire and Rescue Service
National Trust
Natural England
Holcombe Society
2 Residents

Appendix 1 – LFRMS Consultation Draft Comments and Responses

	Respondent	Summary Response	Council Response
1	D Hodcroft – AGMA	What are the cross boundary connections between Bury and other areas? Does Bury sit within a specific catchment? How have you utilised the SWMP 'hotspots'?	Comments noted. Additional references will be added to the Strategy which identify cross boundary connections and catchment areas. The Strategy has used the SWMP data but additional references will be added and a plan identifying the hotspots will be included.
2	Brian Morrow – United Utilities	Table 1 in Section 2 – the inclusion of the data in this table relating to the sewerage system is in breach of the data sharing agreement signed by the Council at the start of the SWMP process.	Comments noted. JBA confirmed that the data agreement had not been breached in publishing the data. JBA suggested amending the text relating to the Table 1. The suggested text has been included and Table 1 has been removed from the final draft.
3	Gwenda Newton – Friends of Nuttall Park	The Strategy should seek to reduce the impact of flood water on Nuttall Park	Comments noted. The Council appreciates the work of the volunteers within Nuttall Park. However, the park is located within the floodplain and therefore provides a natural area to convey and store flood water and reduce risk to existing development.
4	Alistair Waddall – Greenmount Community	Are volunteers allowed to clear blocked grids during a village tidy up?	Andy Southgate replied directly to Mr Waddall. There are a number of health and safety issues involved with gully cleaning and therefore the Council can not authorise members of the public to carry out the process. However this information has been passed onto the Council and recorded for use when planning maintenance regimes.

	Respondent	Summary Response	Council Response
5	Andrew Taylor – Resident	<p>Would like to draw attention to the serious flooding which has taken place on the Hillock Estate in Whitefield. Regular flooding takes place in Lostock Walk when excessive rain water runs from the fields onto gardens and properties at numbers 1,3 and 5 Lostock Walk.</p> <p>Similar flooding has also taken place at 10 and 12 Glaze Walk and Lune Drive – cause blocked drains and excessive rain. These properties are managed by Contour Homes.</p>	<p>This information has been passed onto the Engineering Department. It has been recorded within the flood incident database and has been highlighted as an area for further investigation.</p>
6	Environment Agency	<p>1.1- Could there be specific reference to different sources of flooding?</p> <p>1.2- Locally significant impacts could be seen from large pluvial events (surface water – Prestwich/Whitefield) and also smaller watercourses.</p> <p>1.4-Refer to FWMA 2010 here – LLFA providing the local lead for Flood Risk Management</p> <p>1.5-Housing targets set against NPPF – could there be a section on how these two potentially conflicting aspects will be balanced?</p> <p>Blue square stats boxes – are these national stats or Bury specific stats?</p> <p>2.1 – national stats – can u provide stats for Bury</p> <p>2.3 – there is also the EAs Reservoir Flood Maps as well as the National Flood</p>	<p>Comments noted.</p> <p>Detailed descriptions of different sources of flooding are provided within Chapter 2. Additional references to smaller watercourses and surface water flooding have been added to Para 1.2.</p> <p>An additional reference to FWMA has been added to Para 1.4</p> <p>An additional reference to NPPF and housing targets has been added to Para 3.15</p> <p>Blue Stat boxes have been amended to make it clear that they are national statistics, unfortunately we do not have similar locally specific statistics.</p> <p>Additional references will be added to Para 2.3 as suggested</p> <p>Additional headings will be added to Para 2.6 and 2.10 as suggested and the information relating to Ramsbottom in Para 2.6 will be amended as</p>

	Respondent	Summary Response	Council Response
		<p>Risk Assessment.</p> <p>2.6 – could there be a heading here – Ramsbottom? Then point to 2.6-2.9 below. Figures and maps might be of use.</p> <p>2.6 – this isn't quite right – some of Ramsbottom is protected up to 100 year event, it is not currently the majority.</p> <p>2.10 – could there be a heading here – a geographic description e.g South of Bury</p> <p>2.12 – where were the hot spots? Could these be listed?</p> <p>2.21 – DEFRA's Main River map rather than EA Map</p> <p>3.1 – Could the legislative context come earlier in the documents</p> <p>4 – Could the roles and responsibilities section come earlier in the document?</p> <p>6.5 – or contributions from the Council from their own Capital programme</p>	<p>suggested.</p> <p>Additional hotspot data will be added to Para 2.12</p> <p>Reference to map in Para 2.21 will be changed to DEFRA map as suggested</p> <p>The structure of Strategy was agreed prior to writing.</p> <p>Additional reference to potential funding from capital programme will be added to Para 6.5.</p>
7	Mark Threader – Manchester Fire	The fire service was busy last year with call outs to floods although these appeared to be caused by the heavy rainfall that was experienced rather than from watercourses	Comments noted
8	Alan Hubbard – National Trust	The National Trust note the need for a flood asset register and would be pleased to discuss how they can assist in this with regard to its landholding at Holcombe. National Trust contributes to a reduction in the volume of water to be captured by the gully and catch pit work proposed for	Comments noted.

	Respondent	Summary Response	Council Response
		Moor Road.	
9	Sally Maguire – Natural England	<p>The Strategy is not likely to lead to an environmentally acceptable solution because:</p> <p>Table 4 – does not set out how the strategy will contribute and enhance to the environment or contribute to biodiversity objectives.</p> <p>The Strategy has not taken account of existing nature conservation features and other natural environment issues that may be effect in Bury. NE would like to see the issues flagged up in the SEA to be cross referenced in the Strategy. NE would like to see consideration given to options to enhance the environment and contribute to the achievement of biodiversity targets.</p> <p>The appraisal has not taken account of existing provision for access to the countryside or explored the potential for enhancing access and green infrastructure.</p> <p>Multi-functional green infrastructure can perform a range of functions and NE would encourage the incorporation of GI into the Strategy</p> <p>SEA Scoping Report</p> <p>Additional documents should be included: Conservation of Habitats and Species Regulations 2012; Wildlife and Countryside Act 1981;</p>	<p>An additional objective has been added to the LFRMS which states:</p> <p>“To take a sustainable approach to flood risk management within the Borough, which balances economic, environmental and social benefits with flood risk policies and programmes”.</p> <p>The actions associated with this objective are:</p> <p>“Undertake a Strategic Environmental Assessment, Habitats Regulations Assessment and Water Framework Directive compliance check of the LFRMS”;</p> <p>“Work with EA and Natural England to embed policies from River Basin Management Plans, local environmental policies and designated protected sites into flood risk management procedures and programmes</p> <p>“Encourage natural flood risk management”; and</p> <p>“Seek to provide blue and green infrastructure throughout the Borough”;</p> <p>The Flood Risk Management Strategy Scoping Report has been amended to include the additional key documents NE identified.</p> <p>Additional information regarding the SSSI has been added into the Environmental Baseline report as suggested.</p>

	Respondent	Summary Response	Council Response
		<p>Countryside and Rights of Way Act 2000; and Wildlife and Ecosystem Services. Section 1.2 refers to the SSI – the SEA should provide the details of this SSI and measures for how potential impacts could be overcome.</p>	
10	Falmai Binns – Holcombe Society/Resident	<p>Could the existing flood risk to Moor Road in Holcombe be considered. Could the service and maintenance of Moor Road be considered. In particular silt traps on Helmshore Road and Moor Road need regular Council Service. Request that Moor Road, Holcombe is included with Action Plan</p>	<p>This information has been passed onto the Engineering Department.</p> <p>However, the Engineers have advised that Moor Road is unadopted and therefore not publicly maintained. The Council attend when there is a problem which affects the adopted highway, or represents a safety risk. Moor Road is a private road with a steep gradient. The drainage of the road relies on a culvert on private land, which is privately maintained. The Council has recently undertaken works near the junction to ease the problems, but the main priority will be to prevent surface water flooding of the carriageway of Lumb Carr Road.</p>
11	D E Swithenbank – Resident	<p>Local contextual information regarding local flood risk in the Moor Road area in Holcombe.</p>	<p>This information has been passed onto the Engineering Department and has been recorded within the flood incident database.</p>