

What's changed – Summary of changes made following feedback Received on the Local Flood Risk Management Strategy for Bath & North East Somerset Council

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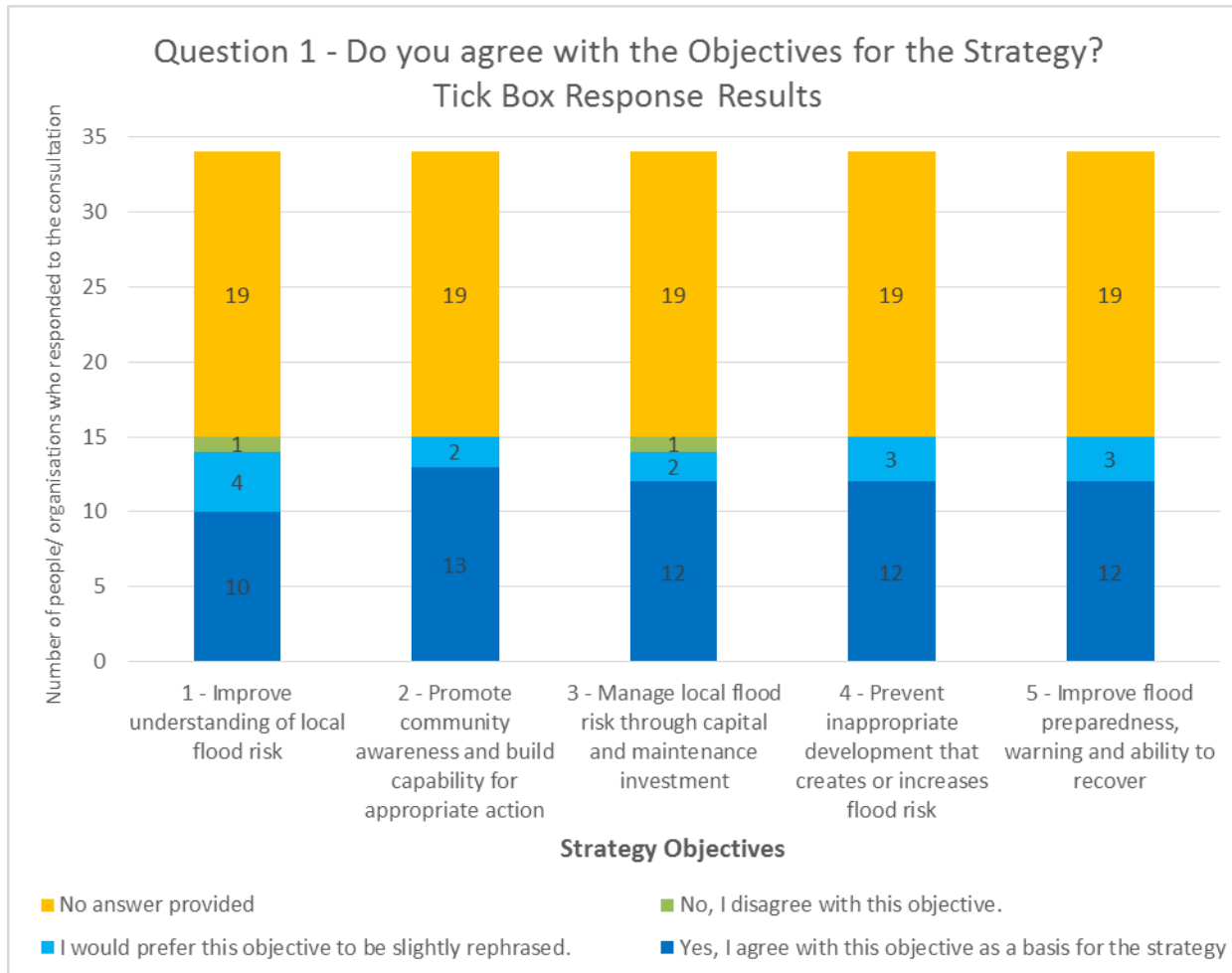
The feedback received from the public consultation on the Local Flood Risk Management Strategy has been analysed, and this document provides a summary of how the feedback has been used to inform changes to the Bath & North East Somerset Local Flood Risk Management Strategy.

The responses to the tick box questions asked during the consultation have been tallied and the results combined in stacked column charts. Consultation comments received for each question have been listed, and the responses from the Drainage & Flooding Team have been listed alongside each of these consultation comments. The consultation comments have also been colour coded, based on key below, to highlight what action has been made.

Key summarising the action taken for each consultation comment:

Colour Code	Action required
Yellow	Change made to the Strategy
Green	No change required/ made to the Strategy

Question 1 - Do you agree with the objectives for the Strategy?



Objective 1 - Comments:

	Consultation Comments:	Drainage & Flooding Team Response:
Comment 1 :	I am currently on this page and suggest the objectives 1 and 5 be along the lines of "Improve understanding to the stage where it identifies the actions needed and who is responsible for taking them." I am a resident of Henrietta Road.	Change – the wording has been amended in the introduction of the objective (e.g. Section 2.1) to more clearly highlight that this is the aim of this objective. The objective itself will not be amended.

Comment 2:	1. It is not clear whose understanding is to be improved. Is it local government's or does it also include the community as well?	Change – in the introduction to the objective (Section 2.1) it has now been clarified that <u>all parties</u> understanding of flood risk is to be improved. This is already reflected in the actions for this objective.
Comment 3:	This objective is fundamentally flawed because it has ignored the extensive recorded information about major flooding incidents in the city of Bath	No change – the records of flooding around Bath have been considered, but only for the period from 2009 to 2014. The reason for this, as outlined in the Strategy, was to prevent misrepresentation of recorded flood incidents which may now have been actioned. If this comment has occurred as a result of reading the location specific actions for Bath, it should be noted that this has now been updated. The wording may have suggested that flooding was not well documented, when in fact what was meant was that due to the way records have been historically recorded they do not always provide all the information required to inform understanding and improvement action.

Objective 2 - Comments:

	Consultation Comments:	Drainage & Flooding Team Response:
Comment 1 :	2. This implies excessive reliance on community awareness - whereas in fact some of the areas most at risk in the city of Bath are areas with the most transient and therefore least informed residents.	No change – the actions include the word 'communities' and it is expected that transient communities such as students would be included in this.

Objective 3 - Comments:

	Consultation Comments:	Drainage & Flooding Team Response:
Comment 1 :	"Reducing flood risk is not just about capital and maintenance investment. The council should also ensure that it has expertise and knowledge within its own domain. This is about human resources and skills, which appear not to have been mentioned in the Strategy."	Change - a paragraph on resources has been included in Section 7.1.

Comment 2:	3. This objective is vague and uninformative - it should make it clear that the partners referred to are agencies with flood responsibilities and NOT developers as currently could be included.	Change – make it clearer that the partners could include any relevant partner who is appropriate to manage flood risk in a particular area. This could include other agencies, communities or developers.
Comment 3:	In Objective 3 (p 18), State clearly what has been undertaken so far and what is being achieved for risk reduction for Bath residents in cooperation with the Environment Agency. The lack of any comment here and the mention of new committees gives the impression that B&NES has not recognised or taken action against such risks in the past. This is the reality but the document implies otherwise. How will such new committees reduce flood risk?	Change – we do not feel it is appropriate to detail everything that has been undertaken by the Environment Agency to protect Bath residents, but have now added a new section (1.4.1) which outlines the need for us to work in partnership with the EA as they lead on flood risk management improvements on Main Rivers.

Objective 4 - Comments:

	Consultation Comments:	Drainage & Flooding Team Response:
Comment 1 :	4. This objective should be a genuine and primary objective to address flood risk in areas where existing residents are at risk and not as effectively an objective to assist developers.	No change. We appreciate that this is obviously an important issue which is why we have made it one of the objectives of the Strategy, but we do not feel it is appropriate to make it the primary objective of the Strategy.
Comment 2:	Traditional construction should not be developed in the flood-prone areas however innovative construction technologies use in the Netherlands, Thailand & the US e.g. amphibious foundations should be considered appropriate in such areas as long as there is no increase in surface water runoff impacting lower in the catchment.	This is an interesting point, but not relevant as part of the Strategy. Through development control such innovative construction could be considered.

Objective 5 - Comments:

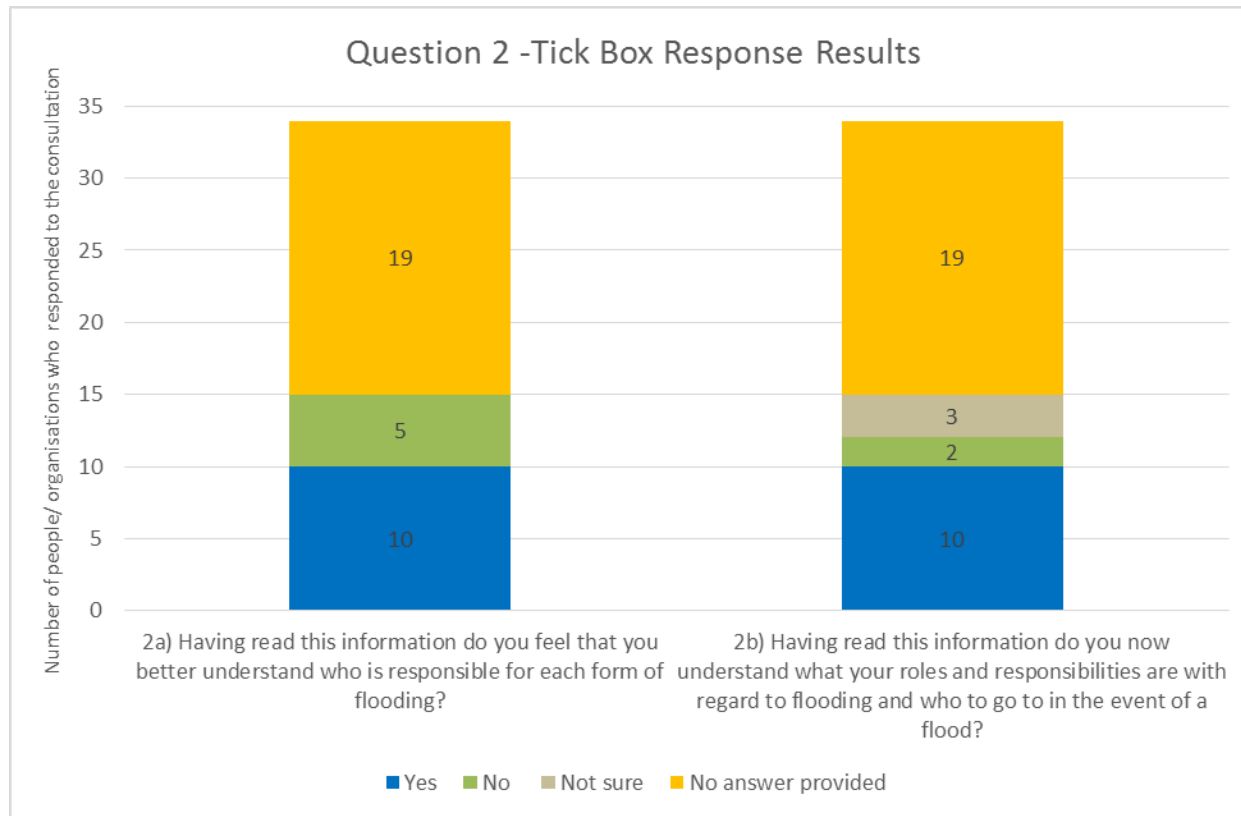
	Consultation Comments:	Drainage & Flooding Team Response:
Comment 1 :	This implies excessive reliance on community awareness - whereas in fact some of the areas most at risk in the city of Bath are areas with the most transient and therefore least informed residents.	Already covered in objective 2 comments.
Comment 2:	In Action Plan (p60) LFRMS-5b should be given the highest priority.	Change – LFRMS-5b has been given high priority as it is important, but will not be given the 'highest' priority.

General comments:

	Consultation Comments:	Drainage & Flooding Team Response:
Comment 1 :	The aims outlined in the document are laudable. The issue is whether they will be delivered	No change - the flood risk committee will hold us to account on the Strategy and its objectives. We are therefore confident that the aims will be delivered in an appropriate timeframe.
Comment 2:	Although I agree with the 5 objectives as a reasonable start point for the strategy I think more emphasis needs to be placed on the key actions required in the strategic plan than on awareness.. objectives 1, 3, 4 and 5 should all be bullet pointed as 'key' objectives and number 2 as a 'key enabling objective'.	No change – we have highlighted in the summary that objective 2 is important and leads through all objectives, but each objective is important in its own right.
Comment 3:	I live in Weston in the flood risk area, I have worked with Officers looking at ways to address the local flood risk and support this strategy	No change, but this is good to hear.
Comment 4:	Please see FoBRA's response to question 5.	No change – refer to comments to question 5.
Comment 5:	I don't think enough is being done to inform people about the risk of flooding. I do not take the local paper as most of the contents are outdated with it being a weekly paper. Therefore I know little about the proposed plans to remove the sluice gates and alter the line if the weir. A publication should be produced and issued to all residence. As I live alongside the river on the London Road the area is subject to flooding. Removing or altering the defences at at Pulteney Weir could have an adverse effect upstream.	No change – there is plenty of readily available information on these subjects on the internet which are up to date. Appropriate links are provided in the Strategy for more strategic issues, but information for specific issues such as Pulteney Weir is available on our website http://democracy.bathnes.gov.uk/documents/s36763/RiverOptionsStudyJune2015.pdf .
Comment 6:	Traditional construction should not be developed in the flood-prone areas however innovative construction technologies use in the Netherlands, Thailand & the US e.g. amphibious foundations should be considered appropriate in such areas as long as there is no increase in surface water runoff impacting lower in the catchment.	No Change – see previous comment on this point that it is not relevant as part of the Strategy. Through development control such innovative construction could be considered.

Comment 7:	Stop repeating the misleading "One in a hundred years" statement. IT IS A PERCENTAGE RISK ie 1/100 chance.	Change – we have updated references in the Strategy to ensure probabilities for annual exceedance are stated instead of return periods. The Glossary did explain this issue, but we have now reiterating this throughout the report.
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Question 2 – Feedback



Question 2a - Having read this information do you feel that you better understand who is responsible for each form of flooding? Comments:

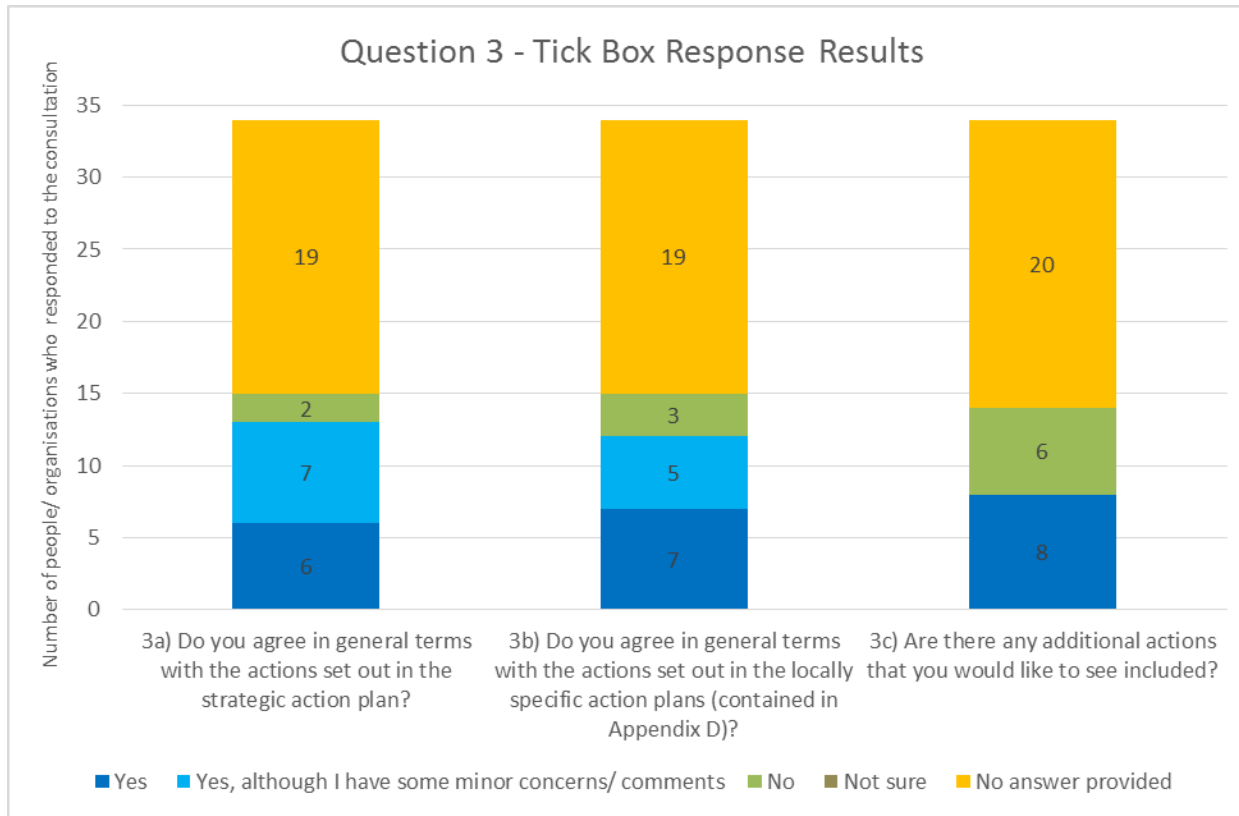
Tick box response:	Consultation Comments:	Drainage & Flooding Team Response:
Yes	Yes but not sure they are doing enough. Hugh developments alongside the river from Midland Bridge down to Newbridge must have an effect on the river and sewerage	No Change – planning policy has been strengthened over recent years and as outlined in the Strategy the effect of new development are considered appropriately by our trained staff prior to planning approval being given. The Environment Agency and Wessex Water will also be consulted as appropriate. If development has an adverse impact then the developer will either have to take steps to mitigate or remove the risks, or else approval will not be given.
No	<p>But I did work for the Environment Agency and predecessors for 41 years, including being the author of the original "Living on the Edge".</p> <p>In saying No I do so to point out that in a potential major flood situation many of these responsibilities are overlapping and I am concerned at the current lack of cross agency co-working. The Strategy needs to point out how inter agency working is going to work and clearly detail the processes for this eg specific liaison committee meetings, clarification of touch points etc etc</p>	<p>No change.</p> <p>Change – it should have been clear from reading the Strategy that we are co working with other agencies. To make this point clearer we have updated Section 3.1 to better explain the role and operation of the Strategic Flood Board & Operational Flood Working Group. We have also improved clarity in Section 1.2 that where there is overlap in responsibilities we will work with other agencies and ensure the appropriate agency takes the lead and brings in appropriate parties as required.</p>

<p>The Strategy appears intentionally to imply B&NES has less responsibility than it has. For example in many places there are references to responsibility of Highways England for highways flooding without making it clear that locally B&NES Highways dept is effectively responsibility. Also, the frequent assertions that somehow fluvial flood waters will in a major flood event be distinguishable from surface water, groundwater etc (as though different coloured) is ridiculous and is used to camouflage the fact that much of the flooding in such an event will be from causes that B&NES are responsible for - this is apparent from studies of past major floods in Bath from which it is clear that those floods typically occur when not only is the river high but the water table is high because of lengthy periods of rainfall. B&NES has framed its strategy as though such flooding from groundwater and surface water is not its responsibility, whereas under the relevant legislation it is. It is notable that other responsible regions have not adopted this narrow and misleading approach.</p>	<p>Change – we do not believe we are taking less responsibilities than we have, but perhaps the wording in certain areas of the Strategy could be clearer. We have improved Section 1 to highlight we have a coordinating role for flood risk management across the county and work in partnership to enable appropriate person/ organisation to undertake action. We have also improved Section 3 (Roles and Responsibilities) to ensure it is clear what our responsibilities are as the Local Highways Authority (e.g. B&NES Highways department).</p>
<p>1) Why does B&NES list of "wet spots" omit densely populated London Road properties especially those in Kensington Place, Ringswell Gardens, Walcot Buildings and Bedford Street. Millions of pounds worth of properties - many of them Listed- lie within the River Avon Flood Plain upstream of the Pulteney Bridge and the Radial Sluice Gate. There are increasing concerns that tampering with the Radial Gate may increase flood risk upstream in addition to the predicted 25% increase in river flow due to Climate Change.</p> <p>2) At this stage it is a matter of concern whether B&NES enjoys the necessary close co-operation with neighbouring authorities (ref. Table 7.1 Black and Veitch Assessment of Environmental Effects of Local FRM strategy August 2015). PARTICULARLY WILTSHIRE which is where the River Water comes from !</p>	<p>1) No Change – the areas listed are outside of scope of this Strategy document. We appreciate that flooding in these areas is not straight forward, but these areas are predominantly flooded by the River Avon which is a main river which the Environment Agency have operational responsibility for. We will however increase the size of the map already included to illustrate areas at flood risk (at an appropriate scale).</p> <p>2) No Change - flows in the River Avon from Wiltshire are outside of the scope of this Strategy document, but the Environment Agency have operational responsibility and not Wiltshire Council. The Environment Agency also already have plans which cover the entire River Avon.</p>

Question 2b - Having read this information do you now understand what your roles and responsibilities are with regard to flooding and who to go to in the event of a flood? Comments:

Tick box response:	Consultation Comments:	Drainage & Flooding Team Response:
	<p>This is again misleading for the reasons in 2a (i.e. The Strategy appears intentionally to imply B&NES has less responsibility than it has. For example in many places there are references to responsibility of Highways England for highways flooding without making it clear that locally B&NES Highways dept is effectively responsibility. Also, the frequent assertions that somehow fluvial flood waters will in a major flood event be distinguishable from surface water, groundwater etc (as though different coloured) is ridiculous and is used to camouflage the fact that much of the flooding in such an event will be from causes that B&NES are responsible for - this is apparent from studies of past major floods in Bath from which it is clear that those floods typically occur when not only is the river high but the water table is high because of lengthy periods of rainfall. B&NES has framed its strategy as though such flooding from groundwater and surface water is not its responsibility, whereas under the relevant legislation it is. It is notable that other responsible regions have not adopted this narrow and misleading approach.)</p>	<p>Change – as before we have clarified our role and made it clear we have a coordinating role for flood risk management across the county and work in partnership to enable appropriate person/ organisation to undertake action. We have also updated Section 3 (Roles and Responsibilities).</p>
Not Sure	<p>If my house is flooding how do I know whether this is due to surface water a BANES responsibility or ' backwash' from the River Avon? I live one hundred yards from the river. If my problem was more minor eg blocked drain then my answer would have been 'yes'.</p>	<p>Change - These complexities are acknowledged and as already outlined above we have updated the Strategy to try and make it clear that significant flooding (as defined in Section 3.4.6) would trigger us to undertake an investigation regardless of source.</p>

Question 3 – Feedback



Question 3a - Do you agree in general terms with the actions set out in the strategic action plan? Comments:

Tick box response:	Consultation Comments:	Drainage & Flooding Team Response:
Yes, although I have some minor concerns/ comments	Many of your surface water flooding problems adjacent to main rivers are exacerbated during high river flows. Therefore it is essential that Wilts CC is included in your partnerships, as the Avon catchment in Wiltshire needs to be positively managed to help B&NES, especially in light of climate change. Wilts don't even feature in the SW Flood Risk Managers Group.	No change – the Environment Agency, who have operational responsibilities regarding the River Avon as a main river, are a representative of Strategic Flood Board and can therefore address issues or concerns regarding the River Avon catchment. Wiltshire Council do not have any statutory responsibility for the River Avon.

	<p>What is not clear... When faced with difficult choices or major planning decisions the council may be entirely dependent on external advice and expertise, especially in regard to engineering and technical subjects. The external advice is likely to come from partner organizations who are not independent but are in fact stakeholders with their own priorities and budgets. Does the council understand the possible conflicts of interest?</p>	<p>Change – we have included a new section (7.1.1) in the Strategy on resources which highlights the internal technical expertise is provided to the Local Planning Authority from the Lead Local Flood Authority.</p>
	<p>The focus of the plan seems to be surface water flood risk and not the flood risk from watercourses.</p>	<p>No change.</p>
	<p>Dunkerton Parish Council has yet to receive a report from its Cllr with responsibility for liaison with flood risk management agencies on the proposed action plan and debate it. No major issues are anticipated.</p>	<p>No change.</p>
	<p>P39 table 4:1, is the risk assessment of return period the wrong way round? A 1 in 30 year return period should be higher risk than 1 in 1000 year. Please refer to the Climate Change Risk Assessment 2017: Projections of future flood risk in the UK. Project A: Report prepared for the Committee on Climate Change, UK. October 2015. Sayers & Partners LLB et al. p viii states that authorities at present base actions & adaptations on 1 in 200 year period, whilst effective to reduce risk to infrastructure up to 2020s & 2050s it will not reduce risk for 2080s. Authorities should base plans on 1 in 75 year return period to effectively reduce risk.</p>	<p>Change - we have amended table 4.1 to be in line with the Environment Agency classification of high, medium and low risk. The way the table was laid out was not wrong, but for consistency we have amended the headings.</p>
<p>No</p>	<p>I initially thought this action plan and strategy was going to cover all flood risks for me and my family at our house in Bath. As this is not the case I find this extremely disappointing, As It appears it is only to cover the BANES related activities. I now see that my house/ family are at the mercy of other agencies for other aspects of flooding not specifically covered by BANES. Hence my earlier comments about the essential need to identify how cross agency working is to work..</p>	<p>No change. We had already identified how cross agency working is undertaken, but have tried to make this clearer within the Strategy. If significant flooding (as defined in Section 3.4.6) occurs then we will undertake an investigation regardless of source and ensure the appropriate authority/ person responsible takes appropriate action. It should be noted that home owners do have their own responsibilities for protecting their properties which are outlined in the Strategy.</p>

<p>The entry for Bath suggests that flooding in Bath is not well-documented. There is much documentation of past flood events, much of it held in Bath library. This should have been researched and the actions informed by it. The actions should also take account of the large number of people at threat in Bath city centre (10000 plus) by having much more comprehensive and proactive actions. The actions should also take account of the importance of the World Heritage Site and potential for damage to heritage buildings. There is no action relating to the Roman Baths. In past floods, the drainage from the Roman Baths has failed and the Baths have flooded. (NB this is NOT fluvial flooding but a failure of the drainage) Any action should surely take account of this threat to Bath's tourism income and reputation.</p>	<p>Change - reference to "not well documented" refers to the quality of the data in the wet spot analysis which means that although there is a great deal of information about flooding occurring in Bath, unfortunately due to the way it was recorded means it is difficult for us to use it to properly aid our understanding. We have clarified / improve the wording in the local specific action appendix to make this clearer.</p>
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Question 3b - Do you agree in general terms with the actions set out in the locally specific action plans (contained in Appendix D)? Comments:

Tick box response:	Consultation Comments:	Drainage & Flooding Team Response:
<p>Yes, although I have some minor concerns/ comments</p>	<p>How will the Cumulative Impact of various planning proposals DOWNSTREAM of Pulteney Bridge upon properties UPSTREAM of the latter be assessed? Table Top Computer Modelling ? Proper Hydrology Studies?</p>	<p>Change – we have added a new section on main rivers to the Strategy to make clear the Environment Agency has operational responsibility for taking the lead on main river projects, plans and policies. Although we have been involved with projects such as Pulteney Bridge it is not appropriate in the Strategy to detail specific schemes. Further information can be found on the internet and at http://democracy.bathnes.gov.uk/documents/s36763/RiverOptionsStudyJune2015.pdf.</p>
	<p>What is not clear... When faced with difficult choices or major planning decisions the council may be entirely dependent on external advice and expertise, especially in regard to engineering and technical subjects. The external advice is likely to come from partner organizations who are not independent but are in fact stakeholders with their own priorities and budgets. Does the council understand the possible conflicts of interest?</p>	<p>See the answer provided for the same comment for Question 3a above.</p>
	<p>As above, Dunkerton Parish Council has yet to fully discuss and understand the action plan</p>	<p>No Change - Check status of Flood Rep</p>

	As above concerning CCRA October 2015 - assessment of risk.	Change – Table 4.1 has been updated so headings are high, medium and low, rather than based on return periods, to make them more consistent with the Environment Agency.
No	I found it very difficult to understand the key risk areas (did they even get a mention?) and how was I meant to link them to my neighbourhood as I couldn't clearly see it in the map in the summary?	Please see previous comments regarding improving the quality of the map provided and improving signposting of the Environment Agency's flood risk maps.
	The action plan for the main areas of Camerton Parish affected by floods does not seem to address at all the risks from watercourse related flooding, which is the primary concern in the Parish. All the actions which are covered by item DA10C (for example) address only surface water. The adequacy of measures taken to ensure that the Cam Brook runs freely and to address the pinch point at the county bridge are not covered at all. Recent extensive flooding of Durcott Lane at both its ends must surely point to this being a significant issue.	No change- we appreciate that it is different to understand the complexities of different authorities being responsible for different aspects of flooding, but although we will take a role to ensure flood risk from all sources is appropriately managed, we will not take the lead on all flooding. We will work with partners (such as the Environment Agency who have operational responsibility for the Cam Brook) to develop joint schemes where it is necessary/ appropriate to do so.
	The entry for Bath suggests that flooding in Bath is not well-documented. There is much documentation of past flood events, much of it held in Bath library. This should have been researched and the actions informed by it. The actions should also take account of the large number of people at threat in Bath city centre (10000 plus) by having much more comprehensive and proactive actions.	Change - reference to "not well documented" refers to the quality of the data in the wet spot analysis. We have clarified / improved the wording related to the Bath City Centre Action location specific action.

Question 3c - Are there any additional actions that you would like to see included? Comments:

Tick box response:	Consultation Comments:	Drainage & Flooding Team Response:
Yes	In partnership with Wilts CC, improve flood plains upstream from Bath. Investigate improving surface water storage in non damaging locations (parks etc) to reduce property damage.	No change – this is outside of the scope of the Strategy. Wiltshire are not responsible for the River Avon, the Environment Agency have operational responsibility and they are a member of the Strategic Flood Board that help govern flooding in the Bath & North East Somerset region.

<p>My understanding is that the main river, the Avon at bath is outside the remit of a local plan the responsibility of the Environment Agency. I hope that the co-operation between local and national organisations is achievable and clear lead taken on this. Please see my comments below regarding the proposed removal of the radial gate at Pulteney weir.</p>	<p>No change. Please be assured that appropriate channels from cross agency working have been set up and will ensure appropriate action on flooding can be taken within the Bath & north East Somerset region.</p>
<p>I would like to see the key risks in my neighbourhood much more clearly identified. If there is then something that I can about mitigating these personally (or by holding BANES or some other agency to account) I would then volunteer to take action with the appropriate authorities.</p>	<p>Change – we have added to section 3.1 that if you wish to become a Flood Risk Representative for your local area then please contact your local Parish Council. There are also plenty of measures you can implement to protect your own home, these are communicated in Section 3.5.2.</p>
<p>Address the flood risk posed by the Cam Brook (which is assessed as High on the EA website) and which could affect a number of properties.</p>	<p>Change – we have added Section 1.4.1 which highlights that the Cam Brook is a main river and therefore the Environment Agency has operational responsibility. However, regardless of sources, if flooding meets the criteria laid out section 3.4.6 it would trigger us to undertake an investigation and ensure appropriate action is taken to mitigate risks by the appropriate person/ authority.</p>
<p>More information to residences</p>	<p>We are unclear what is meant by this comment. There are a number of actions laid out in this Strategy which relate to helping residences understand their risks, who is responsible for associated risks and where to look for further information.</p>
<p>We should consider the introduction of penalties on riparian owners who do not adequately maintain their watercourses. This action might be ameliorated by the re-introduction of grant aiding ditch and agricultural land drainage maintenance, abandoned in the early 1980s. The environmental lobby may need persuading that these actions are not necessarily a contradiction of habitat protection.</p>	<p>There is such a measure in place under the Land Drainage Act 1991.</p>

No	I would like to see the criteria for S19 investigation properly explained to make it clear that multiple occupation single buildings with internal flooding will not qualify for investigation since this is what appears to have been applied in the past.	Change – we have amended the terminology in Section 3.4.6 to clarify the criteria is based on number of dwelling (e.g. a self-contained house, flats or places of residents), rather than number of properties.
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Question 4 - Are you undertaking any actions to help mitigate or prevent flooding?

Comments:

	Consultation Comments:	Drainage & Flooding Team Response:
Comment 1:	I am looking to BANES to identify what needs to be done by whom in this respect.	No change. The Strategy outlines the responsibilities of residents, businesses and authorities.
Comment 2:	FoBRA has been active in pressing B&NES Council to take seriously the very real danger from flooding by the river Avon in the city upstream of Pulteney Bridge; and to invest in its mitigation. Nowhere is this mentioned in the Strategy.	Change - we have provided a new Section (1.4.1.) which hopefully makes it clearer that issues relating to Main Rivers, including the River Avon, are the operational responsibility of the Environment Agency. We recognise the importance of the City in the Bath and North East Somerset region, but it is not appropriate to mention in the Strategy specific items related to the Pulteney Bridge.
Comment 3:	Consider the effects upstream of the Pulteney Weir	This is an Environment Agency led project. For some further information on this scheme please look online or see http://democracy.bathnes.gov.uk/documents/s36763/RiverOptionsStudyJune2015.pdf .
Comment 4:	In periods of prolonged wet weather, Dunkerton village suffers predictable and historic flooding of the Cam Brook at the old bridge near All Saints Church. Local residents maintain an informal flood watch at such times and work together to avoid and deal with issues as they arise, eg residents being cut off from roads out of the village	No change – this is a Main River issue, but details to be passed to the Environment Agency.
Comment 5:	The London Road and Snow Hill Partnership have consistently raised concerns most recently at the 20th July 2015 Planning, Housing & Economic Development Scrutiny Panel regarding possible removal of the Radial Gate.	No change - this is a Main River issue, but details to be passed to the Environment Agency.

Comment 6:	<p>I am a resident of Compton Dando and our parish hall is liable to flooding as a result of the historical replacement of the ford through the village with a stone conduit of insufficient capacity. We have just refurbished the hall after flooding in late 2013 and we took advantage of this to 'flood proof' the building as far as possible with raised foul and grey water outlets, an impermeable floor skin and removable flood barriers across the two exterior doors. Additionally, we have two debris grids across the offending stream which need regular clearing by volunteers as the annual council clearance is insufficient. We also regularly making out ditches at the rear of the building. Most importantly, we have a 'flood watch' rota of villagers who, in theory, will erect the flood barriers across the doors of the hall and alert able-bodied villagers to come and control the floodwater flow. It should be noted though that it is increasingly difficult to get people to commit to this.</p>	<p>No change – this type of proactive action is good to hear about. We appreciate that it is challenging for communities to continue to take strong action to protect themselves, but is much needed.</p>
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Question 5 - Do you have any other thoughts about what is in our Local Flood Risk Management Strategy?

Comments:

	Consultation Comments:	Drainage & Flooding Team Response:
Comment 1:	I haven't done the questions as I feel the most important thing in flood management is that the river is dredged as nothing has been done for forty years, or do the council want another Somerset Levels where the EA didn't listen to the locals and I am a true local I remember the 68 flood. When I walk along the river I can see the silt build up and it is cobbles that the river is self-cleaning it doesn't flow fast enough to do that.	No change - your comments will be passed onto the Environment Agency.
Comment 2:	The map on page 8 of the Summary has been rendered at such a low resolution that it just appears as a blur at least in the online version. As this is such an important piece of information I think this needs to be fixed immediately.	Change – this has been improved.
Comment 3:	There are 48 parishes not 49 as stated 3 times in the document. Section 1.2 final paragraph – add the word education so that it reads: “Flooding cannot be completely prevented, though its impacts can be reduced and managed through investment, education and good planning”	Change – a correction has been made to ensure 48 parishes are stated instead of 49, and ‘education’ has been added to the final paragraph of Section 1.2 as suggested.
Comment 4:	I have reviewed this comprehensive Strategy Document, the only minor comments I have are: Please note it is the Canal & River Trust. I understand it is the collective noun form. In places the document refers to Canals and Rivers Trust. p57 LFRMS – 4a not sure of the Action Supporter ‘Canal & River Trust Emergency Planning Authority’ is there a comma missing?	Change – appropriate updates have been made within the Strategy.
Comment 5:	Typo... Page 63, table 5-2, DA16B – London Road	Change – action DA16B has been updated to ‘London Road’.
Comment 6:	the table in the LFRMS only shows Highways England. Do we need to show the LHA as Statutory Duty Section 41 of the Highways Act 1980 imposes a duty on Highway Authorities to maintain the highway. The duty extends to all Highways maintainable at the public expense, with the exception of trunk roads. This Section 41 duty is not absolute; a Highways Authority must take such care in all the circumstances as is reasonably required to ensure the Highway is not dangerous for traffic. What is reasonable will depend on a number of factors, including those set out in Section 58 (defence against action for non-repair of the Highway). To ensure compliance with section 41 of the Highways Act 1980 the Council operates a comprehensive inspection and repair regime in accordance with the National Code of Practice. Suggestion to include Highways Agency in table summarising those with flood risk duties.	Change – information on the roles and responsibilities of the Highways Authority have now been updated within Section 3 of the Strategy.

<p>Comment 7:</p>	<p>General comment to improve presentation of section 3.4 so that it is a simpler, clearer and easier way for members of the public to find out who to call with different flooding issues. We have previously talked about the idea of creating a kind of - 'cut and and keep' contact sheet. This will require some design work.</p>	<p>Change – Section 3.5.1 & 3.5.2 have been updated to try and make it easier for the public to understand who to report flooding to and how to prepare for flooding.</p>
<p>Comment 8:</p>	<p>It's been highlighted to me that Report 6 Appendix E makes reference to S106 funding of £24.4m collected by B&NES between 2003 & 2013. As this is not wholly funding for flooding and actually is allocated in the main to other projects this could easily be misinterpreted. As such could we tweak the wording on this section from: Funding Sources Relating to Development and Regeneration Section 106 Agreements Section 106 agreements can be used to support the provision of services and infrastructure, including flood risk management measures. The agreements provide a means to ensure that a proposed development contributes to the creation of a sustainable environment, particularly by securing contributions towards the provision of infrastructure and facilities. Between 2003 and 2013 £24.4m was collected in Bath & North East Somerset area through this method. Site viability is key to a developer's willingness to contribute to this type of agreement. The earlier any local flood risk management costs associated with a site are identified the better as developers can then factor these costs into the price of the land and make better informed decisions as to the overall viability of the site. To Funding Sources Relating to Development and Regeneration Section 106 Agreements Section 106 agreements can be used to support the provision of services and infrastructure, including flood risk management measures. The agreements provide a means to ensure that a proposed development contributes to the creation of a sustainable environment, particularly by securing contributions towards the provision of infrastructure and facilities. Between 2003 and 2013 £24.4m was collected in Bath & North East Somerset area through this method. Whilst only small amounts of this funding are directly attributable to use on flood management works, flood management and site viability is key to a developer's willingness to contribute to this type of agreement which has wider implications for development and improvements to the area. The earlier any local flood risk management costs associated with a site are identified the better as developers can then factor these costs into the price of the land and make better informed decisions as to the overall viability of the site. Many thanks, Sarah</p>	<p>Change – the text in Appendix E has been updated accordingly.</p>

Comment 9:	I understand that there are plans for the radial gate at Pulteney Weir is to be replaced. Given the projected increase in flood risk associated with climate change I do not understand why removal of an effective measure would be of benefit. As I live upstream from this I would like assurance that removal will not increase the risk of my property flooding and that the commissioning agency will compensate me for any increase in insurance premium or associated damage to my property if it does.	No change - See previous comments regarding Pulteney Weir. Your comments will be passed onto the Environment Agency.
Comment 10:	I object to the replacement of the sluice gate at Pulteney Bridge with a fixed weir which will not protect the buildings upstream (London Road area) to the same extent as it is currently. As I am currently on the edge of the flooding zone, I may well in future be affected by flooding if this decision is taken. If the council goes ahead and provides worse flooding protection than is currently available, I would like to know what compensation the council will give to properties adversely affected by that decision and why is it that the areas downstream of the weir are being prioritized over the areas upstream?	No change - See previous comments regarding Pulteney Weir. Your comments will be passed onto the Environment Agency.
Comment 11:	<ol style="list-style-type: none"> 1. Please identify key risks for every neighbourhood area in BANES and then show us your mitigation plans for each risk. 2. Please communicate to yes as individuals and as neighbourhoods what you want us to to to help identify key risks and how to help you mitigate them. 3. Please identify finances available and show us in the strategy how you are apportioning theses to the key risks and articulate how you arrived at that conclusion. 4. Please do no be passive about cross agency working or limit yourself solely to what you see as your (BANES) responsibilities. We want to see a fully joined up approach eg at present your cross working with EA seems to focus overly on downstream from Pulteney Weir. What is the focus upstream? 	<ol style="list-style-type: none"> 1) - No change 2) - Change – Section 3.1 has been updated to highlight that if anyone is interested in becoming a Local Flood Represented they should talk to your Parish Council. 3) – Section 6 has been updated to state that our annual budget will be spent on prioritised work and where internal budgets do not fullfull the costs associated then additional funding sources will be identified and applied for. 4) - See previous comments regarding partnership working.
Comment 12:	Apart from the above comments and on an environmental note I suggest that all the documents which are involved in the LFRMS should be available in a format which does not require gallons of multicoloured printer inks/toners if it should be produced in	No change – we will make it clear when we publish the Strategy that we

	hard copy. It looks very pretty but is irresponsible.	can provide printed copies on request
Comment 13:	<p>General Comments: The draft strategy document is misleading to Bath residents, as it is NOT about flooding in the city. However, nowhere is this made clear and the words “River Avon” appear only twice in its 130 pages. The document is, in fact, a strategy for drainage in the whole Local Authority area, and does not attempt to tackle the actual flood risk to the residents of Bath (which is overwhelmingly due to the river). FoBRA appreciates that this may technically be the statutory position but it needs to be made clear from the outset.</p> <p>Specific comments: 1) It should be made very clear, in both the title and the introduction, that this document has no bearing on the major flood risk to Bath residents which is recognised as being from the River Avon. 2) In Objective 3 (p18), it should be stated clearly what has been undertaken so far and what risk reduction is being achieved for Bath residents in cooperation with the Environment Agency. The lack of comment here, and the mention of new committees, gives the impression that B&NES has not recognised or taken action against such risks in the past. 3) In Action Plan (p60) Objective 5 (“Improve Flood Preparedness, Warning and Ability to Recover”). Sub-objective 5b (“Communicate information to communities, businesses and individuals on flood preparedness and recovery”) is presently given a “Low” priority. This should be raised to the highest priority. 4) Appendix D (p112) Wetspot DA 16g: The comment that “sources of flooding have not been well documented” with regard to Bath City Centre cannot be true. There is boundless evidence, stretching over years. This also points to a gap in the document regarding the interplay of river levels and drains consequentially backing up. This will likely be a significant factor in Bath flooding and should be mentioned. Robin</p>	<p>See previous re What is covered vs what is not covered and why and where else to get that information. Also city of Bath 3) Change - Low to High (also change Action 2b from Medium to High 4) See previous re use of 'not well documented</p>
Comment 14:	Well presented, easy to read.	No change – thank you. This is good to hear.
Comment 15:	There needs to be a great improvement in recording of flood incidents since multiple incidents that have been reported to the Council Action line in Bath in our area do not appear to have been included in the list of incidents in the Surface Water Management plans that are linked to in the panel on the right hand side of the consultation page. This should be an essential part of the Strategy since incomplete recordal of incidents will	No change – the procedure for recorded incidents being input into our systems is currently being involved and is outlined by the actions provided under objective 1. This will ensure that

	obviously result in a failure of the strategy.	this issue does not occur in the future.
Comment 16:	We await your responses following your discussions with Wiltshire.	No change – if the need arises for us to talk directly with Wiltshire Council then we will do this, but we do not plan to do this at present. The Environment Agency are operationally responsible for the River Avon.
Comment 17:	<p>The document sets out a forward looking strategy. It sets out a sound framework with appropriate systems for identifying, monitoring, managing and reducing the impact of flood risk to the community.</p> <p>We support the objectives of the Strategy and acknowledge our role as a risk management authority under the Flood and Water Management Act.</p> <p>Table 3.1 – unable to access live Asset Register link. Please can you advise if this is a temporary service problem or local system failure.</p> <p>Is the LLFA going to review the status of flood risk assets before publishing?</p> <p>Flooding investigations under S19 for 5 properties is consistent with adjacent LLFA proposals.</p> <p>Section 3.5 – on surface water run-off. This appears to be misleading or confusing subject to interpretation. Can we review the wording of this paragraph?</p> <p>4.2 – we note rising groundwater is unlikely to be a significant source of flood risk within the authorities area.</p> <p>4.7 Wet Spots & Table 5.2 – DA05A is assigned to Wessex Water. We understand these actions to be addressed with recent requisition schemes which include some capacity for land drainage flows, however this may not resolve all flooding from land drainage systems at this location.</p> <p>7.3 Allows for updating on a 5 yr rolling period.</p> <p>We are aware of increased planning and development work by LLFA staff, who now act as statutory consultee for development management.</p> <p>If any further information is required please advise.</p>	<p>Change – we are working on issues with the live Asset Register link. Hopefully these will be resolved shortly. With regard to your comment on Section 3.5 we have amended the text and removed reference to the ‘Law of Tort’.</p> <p>We will update the status of actions on an annual basis and will update the status of D05A at this point.</p>
Comment 18:	<p>Regional Surface Water Management Plan???? Do they mean BANES Surface Water Management Plan?</p> <p>Page 13 – No mention of Flood Risk Management Plans</p> <p>Page 16 – The warning and responding to flooding incidents is primarily undertaken by</p>	Change – we have updated references to our SWMP to ‘Bath and North East Somerset regional Surface Water Management Plan’ to make this

<p>the emergency planning authority. Flood warnings issued by EA!!</p> <p>Page 30. Table 3-2 - Imminent or current flooding of property from Main Rivers or sea/tidal sources</p> <p>Page 31 – Table 3-3 - All households in areas at risk from coastal or Main River flooding (classified as Flood Zones 2 and 3) should have been contacted notifying them of this and, unless they have chosen to opt-out, will receive flood warnings from the Environment Agency when the risk of river or coastal flooding is high. We no proactively write to people informing them that they are in FZ2 or 3 even when we update our flood maps. We notify residents if we create a new flood warning area that they are automatically added to our system to receive flood warnings and giving them an option to opt out.</p> <p>Taking measures to ensure that your house is protected, or the impacts will be reduced, through use of property level protection – include - creation of a personal/property level flood plan.</p> <p>Page 79 – Typo – should read – a river overflowing it’s banks or being breached.</p> <p>Page 98 – Typo – should read - major*</p> <p>Page 100 – bullet point 4 - should read - responsible for consenting for work or operation conducted in, over or under the bed of, or within 8 meters of the top of a bank of a Main River.</p> <p>Page 100 – Remove points 4 and 5 and replace with above.</p> <p>Page 127 – Flood Zones – Updates are published on a quarterly basis</p> <p>Page 129 – Formatting issues e.g. Sequential Test and Sewer Flooding</p>	<p>point clearer.</p> <p>Page 13 – Agreed. We have now mentioned the relevant Flood Risk Management Plans in Table 1.2 and Appendix A.</p> <p>Page 16 – we agree and have updated the emergency planning section to try and highlight this further.</p> <p>Page 31 – agree. We have incorporated this into Table 3.2.</p> <p>Page 79 - No change. This is correct as it is.</p> <p>Page 98 – Agreed. This 'r' has been amended.</p> <p>Page 100 – Agree. This section has been updated.</p> <p>Page 127 – Agree. We have updated the Glossary accordingly.</p> <p>Page 129 – Agreed. This has been amended.</p>
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<p>Comment 19:</p>	<p>Hi, a well presented document. Thank you for inviting our comments. A few suggestions to promote the positive aspects of the LFRMS and include safeguards for the HE. Hope of use.</p> <p>Sincere regards,</p> <p>Thank you for providing an opportunity to consider and comment on the emerging LFRMS and its associated SEA, of particular interest to Historic England for the following reasons:</p> <ol style="list-style-type: none"> 1. The vulnerability of most heritage assets (designated and non-designated) to flooding, including occasional flooding, and the potential harm to or loss of their significance. 2. The potential impact of flood risk management measures on heritage assets and their settings, and including impacts on water-related or water-dependent heritage assets. 3. The potential impact of changes in groundwater flows and chemistry on preserved organic and palaeo-environmental remains. Where groundwater levels are lowered as a result of measures to reduce flood risk this may result in the possible degradation of remains through de-watering, whilst increasing groundwater levels and the effects of re-wetting could also be harmful. 4. The opportunities for conserving and enhancing heritage assets as part of an integrated approach to flood risk management and catchment based initiatives, including sustaining and enhancing the local character and distinctiveness of historic townscapes and landscapes. 5. The opportunity for increasing public awareness and understanding of appropriate responses for heritage assets in dealing with the effects of flooding as well as the design of measures for managing flood risk and improving resilience. 6. The opportunities for improving access, understanding or enjoyment of the historic environment and heritage assets as part of the design and implementation of flood risk management measures. <p>With the above in mind I have the following observations on the SEA and LFRMS.</p> <p>LFRMS Strategic Environmental Assessment</p> <p>I note the following extracts:-</p> <ul style="list-style-type: none"> • SEA objective no.6 - <i>To Protect and enhance features that define the cultural heritage of B&NES</i> • Recognition of the significance of the District's historic environment 	<p>Change – we have now reference to heritage within the Strategy in Section 1.2, 1.5, 1.6, the text of action LFRMS 3c.</p>
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	<ul style="list-style-type: none"> • Those heritage assets in B&NES at risk from flooding • The potential harm to the significance of heritage assets from insensitive 'structural engineering schemes' • The recommended mitigation (to avoid harm) • The suggested monitoring <p>Local Flood Risk Management Strategy</p> <ol style="list-style-type: none"> 1. Unlike the SEA, reference to the historic environment in the LFRMS is limited. 2. For example, there is no objective relating to the historic environment. Perhaps there is the scope for a Sub Objective to the LFRMS Objective no. 3, such as, 3. <i>To reduce the risk of flooding of the District's heritage assets (World Heritage Site, Scheduled Monuments, Listed Buildings, Conservation Areas, Battlefields, Registered Parks and Gardens, and non-designated assets), and ensure that the measures for managing flooding minimise harm to and, where appropriate, enhance their significance.</i> 4. We would encourage the LFRMS to emphasise the need for flood alleviation schemes and other proposed initiatives in the Action Plan, Surface Water Management Plan and relating to catchment land management proposals (where appropriate), to be informed by relevant <i>heritage</i> expertise (e.g. /i.e. B&NE Conservation Team) to ensure appropriate solutions are considered. 5. Could we encourage consideration of points 1-6 above and how the LFRMS might also reflect how the SEA has considered the implications for the HE (both positively and potentially negatively). 	
<p>Comment 20:</p>	<p>Thanks for consulting with us on your Local Flood Risk Management Strategy. We have reviewed the document and have identified some areas where we might want to work together in the future in terms of sharing information or looking at mitigation measures.</p> <p>You have identified Chew Magna as an area that is vulnerable to flooding. The upper catchment that drains to the village is partly located in North Somerset, where we have some issues with very localised flooding in Winford. Your proposed measures are to monitor and record flood incidents in this area. There might be benefits in sharing flood incident information in this location to help understand mechanisms and catchment impacts in terms of flood risk. This may assist with identifying suitable solutions and also providing other opportunities to implement source control measures within the catchment.</p> <p>There are likely to be benefits in continuing to work together through the West of</p>	<p>Agree - Discuss 'Chew Magna' Actions and relevant partners. Include North Somerset as an 'Action Supporter' in location specific.</p>

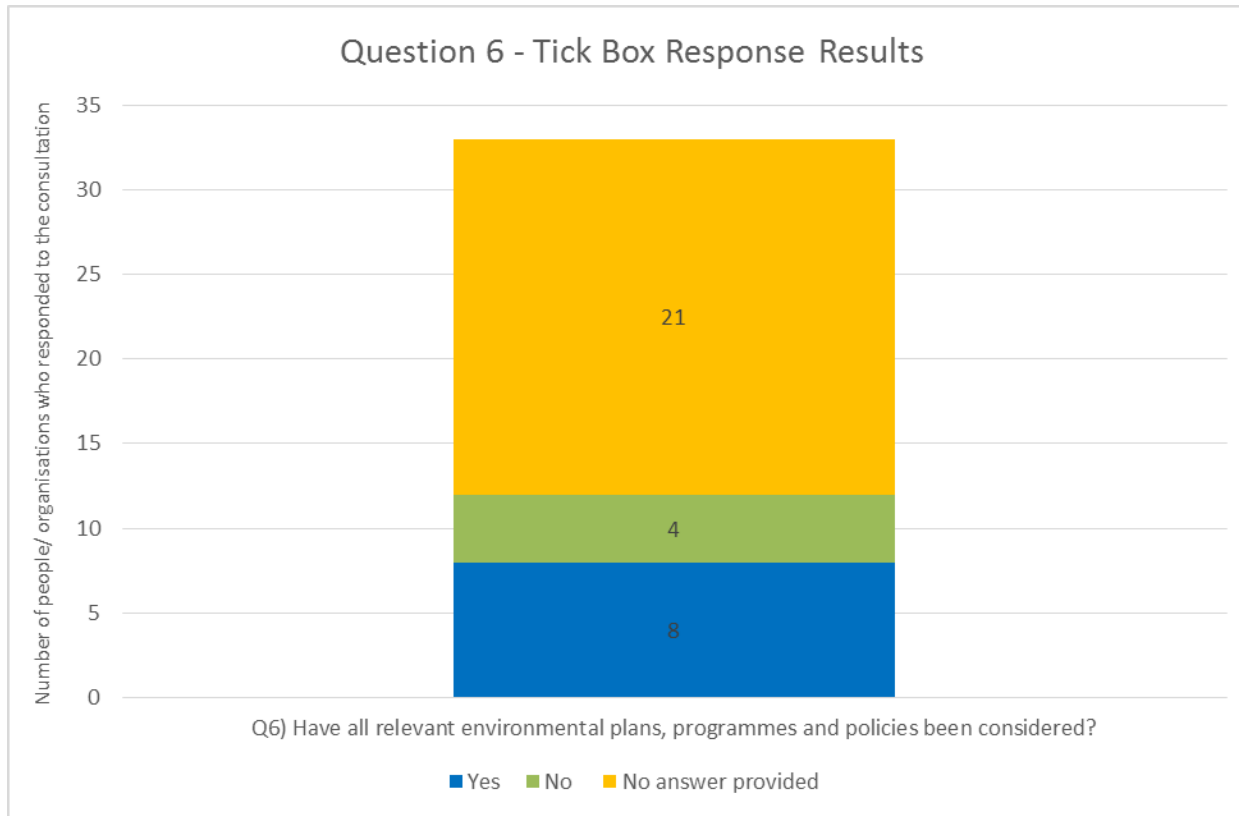
	England flood working group to share information on these issues and to explore synergies in our future activities.	
Comment 21:	<ul style="list-style-type: none"> • We welcome the draft strategy but as investment in flood prevention measures saves costs associated with flood damage including the reduction in interruptions to business activity reassurance is needed that the funding to implement the necessary maintenance and other works to mitigate flooding will be given sufficient priority. • We ask what resources are available to support Local Flood Representatives (Objective 2a). • We ask whether as an alternative to a Local Flood Representative, where one is not identified or forthcoming, a Parish or Town Council, for example, might have a role as an information portal for receiving and passing on flood prevention maintenance issues to the relevant authorities. 	<p>Change - we prioritise funding on a risk based analysis. Flood risk to properties and/ or those which cause health and safety concerns scoring the most highly. If internal funding cannot fund the entire project then we would look for external sources of funding. We have amended text in Section 6 of the report to highlight this.</p> <p>It is not relevant to discuss resources for Local Flood Representatives in the Strategy. Please discuss this directly with your Parish Council if you wish to be involved.</p> <p>Thank you for your point regarding Parish Council's acting as a portal for passing on information. This is something that will hopefully result from the actions outlined.</p>
Comment 22:	<p>Many thanks for your email and the information. This was discussed at our October meeting. The Council wished me to make you aware of the flooding which has occurred in Stitchings Shord Land and Ham Lane and have asked me to send you a link (below) to footage of this flooding which has occurred in these lanes.</p> <p>https://www.youtube.com/watch?v=ME6FbjAVUQs</p>	<p>No change - Thank you. This will be highlighted at our next Operational Flood Working Group meeting.</p>
Comment 23:	<p>Thank you for the opportunity to comment on the draft Local Flood Risk Management Strategy and please treat the following as an official response: World Heritage is not referenced in the draft Local Flood Risk Management Strategy and this is considered to be an omission. Whilst it is acknowledged briefly in the Strategic Environmental Assessment this is a supporting document and does not</p>	<p>Change – thank you. We have updated the Strategy to include reference to Bath as a UNESCO World Heritage site and appropriate plans. Changes have been made in</p>

	<p>remove the need to provide reference in the main strategy.</p> <p>World Heritage is the highest global accolade that can be bestowed on a heritage site, and Bath is exceptional in that the entire city is inscribed. Within Europe only Venice provides a comparable example. As in Venice, environmental protection and conservation of globally important heritage are inter-connected. World Heritage status is first and foremost a significant responsibility for B&NES (as principal site steward) but it is also worth millions of pounds to the economy of the district.</p> <p>Flooding is a recognised threat to the World Heritage Site and UNESCO expects us to have management measures in place. In this respect the draft Local Flood Risk Management Strategy is very welcome but there should be clear cross-reference between this document and the City of Bath World Heritage Site Management Plan. This will deliver your objective of ensuring ‘that local flood risk is managed through a coordinated approach’ and demonstrate a holistic response to environmental protection. The World Heritage Site management Plan (endorsed by Full Council) is delivered through a partnership body which includes many of the stakeholders involved in the production of the flood plan and I believe these stakeholders would expect to see this cross referencing.</p> <p>I would be happy to work with you to draft minor alterations to the draft strategy which will address the above concern. I am also aware that my colleagues in the Historic Environment team may wish to assist you in strengthening references to how the strategy impacts on our statutory duties to protect archaeology and historic structures. Finally, the glossary in the Strategic Environmental Assessment relating to World Heritage Sites is inaccurate and I suggest the following amendment:</p> <p>Current: A natural or man-made site, area or structure recognised as being of outstanding international importance and therefore as deserving special protection. Sites are nominated to and designated by the World Heritage Convention (an organisation of UNESCO).</p> <p>Suggested replacement: A cultural or natural site deemed to be of outstanding universal value, the protection of which is important to all humanity. Sites are nominated globally by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) who also put in place operational guidelines for management and protection.</p>	<p>Section 1.6 and Appendix A as a result.</p>
<p>Comment 24:</p>	<p>There would appear to be insufficient power in our planning regulations to control and limit hard surface run off.</p> <p>NB: Although not part of the scope of this report, it is worth noting that any flooding threat nowadays is exacerbated by a change of attitude to impending the risk. 25 years ago, when our hall was flooded, the resulting mud was allowed to dry before being</p>	<p>No change – thanka for the feedback. The National Planning Policy Framework makes reference to managing surface water runoff from new developments.</p>

	swept out and, in the mean time, people simply wore gumboots to events!	
<p>Comment 25:</p>	<p>The document is, by the very title, misleading to Bath residents. The presentation that preceded the drafting of this strategy began with the direct statement: “this is NOT about flooding in Bath”. Nowhere is this made clear and the words “River Avon” appear only twice in 130 pages. The document is, in fact, a strategy for drainage in the whole B&NES area and never attempts to tackle the actual flood risk to the residents of Bath. This is based on a strictly literal but artificial interpretation of the statutory position under the Flood and Water Management Act 2010 but to the greater population of Bath the “Local” flood risk is overwhelmingly from the River Avon, and it is notable that other neighbouring regions do not appear to have adopted this over-literal and artificial approach.</p> <p>See for example the equivalent Bristol document.</p> <p>We believe it is at best questionable whether B&NES is entitled to adopt this literal approach under the FWMA2010, apparently disregarding all related duties and obligations under other legislation and guidelines such as the Civil Contingencies Act 2004.</p> <p>Although this fine distinction is covered in the definitions on page 3 the casual observer will note that this is given a backdrop of a river with a canal narrow boat. In the B&NES area this can only be the River Avon. A small point but it is important that the residents of Bath are not given the impression that this document means that B&NES has a strategy for flood alleviation in Bath. Other than the collateral protection from the Bath Quays scheme this is not the case.</p> <p>Specific comments:</p> <p>1) It should be made very clear, both in the title and introduction, that this document has no bearing on the major flood risk to Bath residents which is recognised as being from the River Avon.</p> <p>2) In Objective 3 (p 18), State clearly what has been undertaken so far and what is being achieved for risk reduction for Bath residents in cooperation with the Environment Agency. The lack of any comment here and the mention of new committees gives the impression that B&NES has not recognised or taken action against such risks in the past. This is the reality but the document implies otherwise. How will such new committees reduce flood risk?</p> <p>3) In Action Plan (p60) LFRMS-5b should be given the highest priority.</p> <p>4) P112 DA 16g.</p> <p>The comment that “sources of flooding have not been well documented” with regard to Bath City Centre is not credible.</p> <p>This also points to a gap in the document regarding the interplay of river levels and</p>	<p>1) Change - we are sorry that you find the Strategy misleading, but the title does state Bath & North East Somerset Council as our responsibility is for the whole of the region and not just Bath. We have however now included a section on main rivers (which the River Avon is) to clarify the position on main river issues. We have also improved Section 1.2 to highlight that we will take a role in ensuring flood risk is appropriately managed regardless of source, but this does not necessarily mean we will lead projects as it would be inappropriate for us to do this.</p> <p>2) – we have now signposted people to the fact that the Environment Agency have their own plans in place, but it is not appropriate for us to list each of these in this Strategy.</p> <p>3) Change – we have changed the action priority to High, but its priority is not considered to be higher than any of the other high priority actions.</p> <p>4) please see previous comments about this issue which state we have amended the text as it is not that there are limited records, but that the quality of records is poor.</p>

	<p>drains backing up. This will be a significant factor in flooding in Bath.</p> <p>Further comments.</p> <p>The link to the Flood Asset Register on page 26 of the main document does not work for us. We are concerned that the process for making sure that sensitive assets appear on the register is not robust and reliable? We have reason to believe that our frequent reports of flooding at the gulleys outside Villa Magdala on Henrietta Road for example – do not appear on a list of apparent incidents at http://www.bathnes.gov.uk/sites/default/files/siteimages/banes_surface_water_management_plan_150827_-_appc.pdf</p> <p>This strategy does not address the interplay of rising river levels, blocked drains and groundwater levels due to a full water table. These factors are clearly linked and cannot be addressed separately.</p> <p>Studies of past floods in Bath show this to be the case.</p> <p>We refer again to neighbouring strategies that do not take this unreasonably narrow and artificial approach.</p> <p>We consider this a lost opportunity to finally begin to address the long standing and growing threat to public safety in Bath. It will in fact enable further inaction due to the vagueness of the objectives and their interpretation.</p> <p>We urge a reconstruction of the document and inclusion of planning toward a holistic approach to flood alleviation in Bath.</p>	
<p>Comment 26:</p>	<p>I understand that there are plans for the radial gate at Pulteney Weir is to be replaced. Given the projected increase in flood risk associated with climate change I do not understand why removal of an effective measure would be of benefit. As I live up stream from this I would like assurance that removal will not increase the risk of my property flooding and that the commissioning agency will compensate me for any increase in insurance premium or associated damage to my property if it does.</p>	<p>Please see previous comments regarding this issue. This is a main river issue. Your concerns will be passed on.</p>
<p>Comment 27:</p>	<p>I object to the replacement of the sluice gate at Pulteney Bridge with a fixed weir which will not protect the buildings upstream (London Road area) to the same extent as it is currently. As I am currently on the edge of the flooding zone, I may well in future be affected by flooding if this decision is taken. If the council goes ahead and provides worse flooding protection than is currently available, I would like to know what compensation the council will give to properties adversely affected by that decision and why is it that the areas downstream of the weir are being prioritized over the areas upstream?</p>	<p>Please see previous comments regarding this issue. This is a main river issue. Your concerns will be passed on.</p>

Question 6 - Have all relevant environmental plans, programmes and policies been considered?

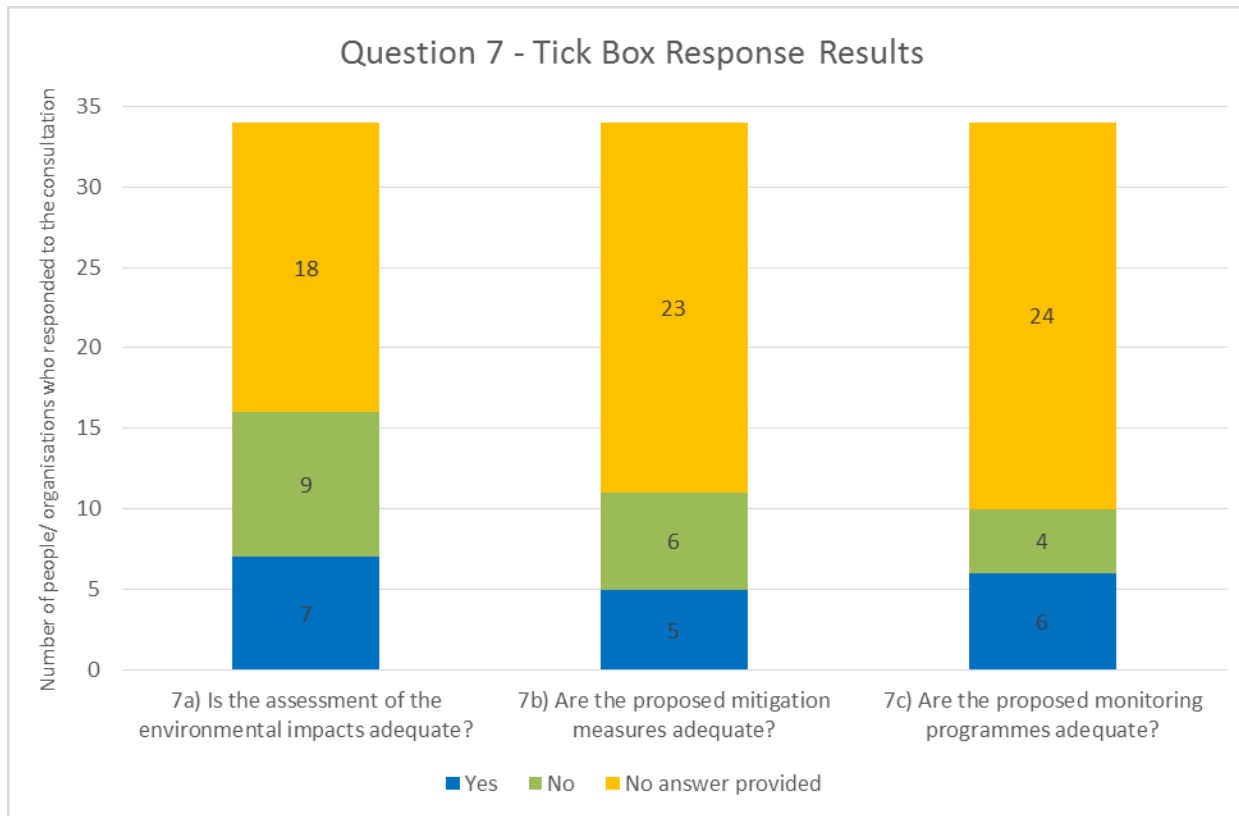


Comments:

Tick box response:	Consultation Comments:	Drainage & Flooding Team Response:
Yes	I assume they have	No specific comment so no change.
	Maybe but as a local community group we are unable to comment.	
No	Don't know!	No change – this specific concern should be addressed as part of planning process.
	It mentions in the strategy that objective 4 is to deny inappropriate planning proposals. Does the option appraisal for the eastern Park and Ride fit into this? If not why not?	
	Please see FoBRA's response to question 5. (see comment 13 of Question 5 responses)	No specific comment so no change.

	The Strategy appears to have been drafted artificially in isolation of B&NES's responsibilities under Contingencies Act 2004 and National Flood Framework guidelines.	Change – we do not believe this to be the case, but have updated Section 3.4.4 to make roles undertaken by the Emergency Planning Authority clearer.
No answer provided	I am not qualified to answer this	No specific comment so no change.

Question 7 – Questions regarding the Strategy Environmental Assessment (SEA)



Question 7a – is the assessment of the environmental impacts adequate? Comments:

Tick box response:	Consultation Comments:	Drainage & Flooding Team Response:
Yes	I assume they are	No specific comment so no change.
	At the strategic level, yes	No change – we are glad agree.
	As a baseline now but does not take account of change of climatic factors by 2050 (guestimates) page 49. How robust are the latter estimates?	No change – we have accounted for climate change within our approaches and based assumptions on current guidance within the National Planning Policy Framework.
No	Don't know.	No specific comment so no change.
	The strategy barely gives a mention to cross agency working re the EA responsibilities with the River Avon. That is a key strategic environmental issue, so why not?	Change – we have mentioned cross agency working in Section 3.1, but have now strengthen the wording in Section 1.2. and 3.1 to make this clearer.
	Please see FoBRA's response to question 5. (see comment 13 of Question 5 responses)	No specific comment so no change.
	The Strategy appears to have been drafted artificially in isolation of B&NES's responsibilities under Contingencies Act 2004 and National Flood Framework guidelines.	Change – we do not believe this to be the case, but have updated Section 3.4.4 to make roles undertaken by the Emergency Planning Authority clearer.
No answer provided	I don't know	No specific comment so no change.

Question 7b - Are the proposed mitigation measures adequate? Comments:

Tick box response:	Consultation Comments:	Drainage & Flooding Team Response:
Yes	I assume they are but they are yet to be tested	No change
	At the strategic level, yes	No change. We are glad you agree.
No	We have recently purchased a home on St John's Road, Bathwick, Bath BA2 6PZ. We understand that the basements of a couple of homes have been flooded by the drains. Could this not be avoided by Wessex Water have one way non-return valves fitted in the drainage system?	No change. Your concern will be passed on to Wessex Water. It is not appropriate to address this specifically within this Strategy.
	Don't know.	No specific comment so no change.
	As previously mentioned the mitigation plans in this strategy are non existent.	No change – please refer to Appendix D for location specific action plans.
	Please see FoBRA's response to question 5. (see comment 13 of Question 5 responses)	No change

	The Strategy appears to have been drafted artificially in isolation of B&NES's responsibilities under Contingencies Act 2004 and National Flood Framework guidelines.	As per this same comment previous - Change – we do not believe this to be the case, but have updated Section 3.4.4 to make roles undertaken by the Emergency Planning Authority clearer.
	Because we do not know the unknown. ie planning proposals downstream and possible measures by Wiltshire upstream.	No change. As outlined the Environment Agency are operationally responsible for main rivers which includes the River Avon. It is not the responsibility of Wiltshire Council.
No answer provided	I don't know	No specific comment so no change.

Question 7c - Are the proposed monitoring programmes adequate? Comments:

Tick box response:	Consultation Comments:	Drainage & Flooding Team Response:
Yes	So long as they are implemented	No change. As highlighted in Section 7.1 there is a governance approach in place to ensure the Strategy is adequately reviewed/ monitored.
No	Don't know.	No specific comment so no change.
	Without cross agency structures and processes the strategy is sadly lacking. I think it would also be useful to publish progress against plans in Council Connect, say 3 times a year.	No change. We have highlighted that cross agency working is happening. The Strategy will be reviewed annually and Action Plan updates published on our website.
	Please see FoBRA's response to question 5. (see comment 13 of Question 5 responses)	No specific comment so no change.
	The Strategy appears to have been drafted artificially in isolation of B&NES's responsibilities under Contingencies Act 2004 and National Flood Framework guidelines.	As per this same comment previous - Change – we do not believe this to be the case, but have updated Section 3.4.4 to make roles undertaken by the Emergency Planning Authority clearer.
No answer provided	Don't know	No specific comment so no change.
	As a community group we are not in a position to answer.	No specific comment so no change.