

Taking a Strategic Approach to Investment in FCERM

Northamptonshire Case Study

Draft Investment Plan (v7 – 17.08.12)

August **2012**

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Preamble

Northamptonshire County Council (NCC), as a Lead Local Flood Authority (LLFA), has offered to be a case study for Defra's R&D project (FD2656) which is examining strategic investment planning in flood and coastal risk management (FRM). One of the aims of this research is to develop an "Investment Plan" for each case study in order to test ideas and develop a potential template(s) for use by other LLFAs and their partners. This draft Plan was produced by the research project team, which included JBA Consulting, Northamptonshire County Council (NCC) and the Environment Agency Flood Risk Management Strategic Overview Team. The study is a pilot produced by JBA in consultation with Northamptonshire CC. The information contained in the report is illustrative / indicative. Further work has been subsequently carried out by NCC to identify further schemes and prioritise these schemes as part of the local strategy. Future iterations of their Investment Plan will be published as part of the local strategy and associated action plan.

The Investment Plan sets out which FRM schemes could be funded and how. It includes schemes related to all sources of flooding within Northamptonshire. The Plan's focus is on the short term (i.e. next 3 years). This decision was taken in part because of the lack of data on potential investment choices beyond this, but also to focus limited project resources in the most useful way. It should be noted that this draft Plan has not benefitted from wider input and review – this will be vital for any "real" Investment Plan to succeed – and it is expected that this will be completed by Northamptonshire County Council as part of the consultation on the local strategy and associated action plan.

Refer to the main R&D report (FD2656) for further information about the research.

Executive Summary

Context

This Executive Summary is presented in order to provide decision makers / investors in Flood Risk Management (FRM) in Northamptonshire concise insight into the viable local FRM improvement opportunities and how they might be funded. The local FRM partnership group (Northamptonshire Flood and Water Management Framework, NFWMF) have decided that a shared programme of FRM schemes / measures should be promoted. The only present exception is water company schemes, which are excluded. This Investment Plan reflects this. However, it does not summarise any individual Local Flood Risk Management Strategy (Local FRM Strategy) or other strategic assessments, it draws findings from them and informs future updates of such strategic assessments.

Scale of the problem

Northamptonshire has nearly 60,700 residential properties predicted currently to be at risk of surface water flooding (to at least 0.1m deep) during an extreme rainfall event with an annual probability of 0.5% (1 in 200 year return period). There are nearly 7,000 residential properties predicted to be affected by fluvial flood risk with a probability of at least 0.1% (1 in 1000) across the county and taking into account current flood defences.

As a result of climate change, this risk to properties and life is likely to increase significantly in coming years unless long term development planning and investment in flood risk management measures is made.

Flood Risk Management Funding Framework

Central Government Flood Defence Grant in Aid (FDGiA) is the major funding source and this is accessed in accordance with Defra's "Partnership Funding" policy. At present, £160million pa is invested by government through FDGiA, with a further £30million from Regional Flood and Coastal Committees (RFCC) through Local Levy, and £25million from "partnership funding" – contributions from other sources. Government policy is for the latter to grow significantly and the rules for accessing FDGiA have been adjusted to assist this.

LLFAs (and other flood "Risk Management Authorities") are required to submit an annual Plan, referred to as the Medium Term Plan (MTP), to the Environment Agency. This plan indicates whether FDGiA is sought and provides the key information needed for the Agency to assess what, if any, level of FDGiA support is possible. This assessment includes the performance of the scheme in delivering against Defra Outcome Measures. A "Sanctioned List" is then published for each region determining the allocations. Regional Flood and Coastal Committees (RFCCs) have an important role to play. They are the key decision makers in terms of support for the MTP and can also influence which scheme FDGiA is actually allocated to once funds are allocated within the region.

Therefore, the priority is to find local funds to support bids for FDGiA – use the possibility of obtaining FDGiA to lever in local funds. There is a community engagement and political process too. The Local FRM Strategy identifies and prioritises FRM activity. Also, where schemes are not likely to be supported by RFCC and FDGiA then this needs to be clearly communicated to the local community and relevant authority. With technical support from NFWMF, this enables them to take local ownership of the issue.

The Local FRM Strategy is currently under development and this initial Investment Plan has been used to inform its development. The Investment Plan will need to be revisited on completion of the Local Strategy and annually thereafter, as a minimum, to support the MTP process.

What can be achieved in the short term

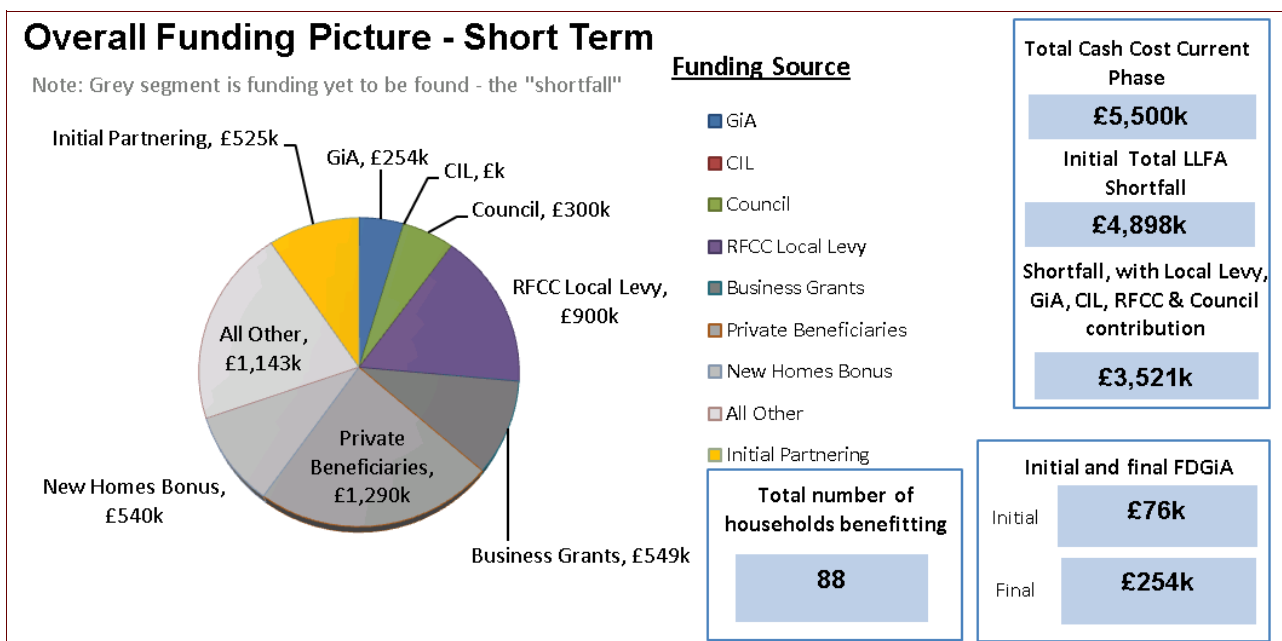
The NFWMF currently has a short term list of potential schemes that they are investigating, as presented in Table ES1. For a full list see Section 3 of this report. The programme set out would reduce flood risk to a range of businesses and approximately 400 homes throughout Northamptonshire, but with greatest benefit in the Raunds / Rushden area and in Kettering. Although this is a modest number compared to the total at risk, it represents a significant funding challenge. Indeed, the quantity of FDGiA potentially available is probably too high in the table as it is based on relatively optimistic assumptions. Central government FDGiA will not be the main source of FRM funding in the short term.

The local funding required in the short term will need to come from a variety of sources, from partner authorities such as the Borough and Districts and the RFCC, beneficiaries of schemes and a limited resource direct from the county council as Lead Local Flood Authority. An indicative level of funding has been set out in terms of what would be required for the next three years. If the funding gap identified is not filled then the schemes will be scaled back and the number of homes benefitting would potentially reduce to fewer than 100.

The challenge presented at district level in Table ES1 is aggregated at county level in Figure ES1. The potential funding gap is shown in the colour grey, together with the more likely options for where this funding might be found based on a screening assessment. Therefore the districts, councillors, RFCC and local communities will need to be engaged in order to make this short term programme viable. If further local funding support is not forthcoming then the scale of the potential schemes will have to be revisited and this Investment Plan updated.

A coordinated approach led by the County Council as Lead Local Flood Authority is considered essential.

Figure ES1: Strategic Summary at County Level



NB: Based on Scenario 2b

Table ES1 – Indicative Financing of Schemes for Delivery

District / Borough	Scheme name	Scheme cost	Possible FDGiA	Secured or likely local government contribution	Funding gap to fill	Potential sources to fill gap
East Northants DC	Skew Bridge and Raunds Hog Dyke Culvert Improvements	£1,712k	£0k	£492k	£1,221k	Local community, EA, ENDC, NCC
South Northants Council	West End, Silverstone Flood Alleviation Scheme	£149k	£23k	£126k	0	Local community, NCC SNC
South Northants Council	Kings Sutton, Wales Street Flood Alleviation Scheme	£192k	£121k	£71k	0	Local community, SNC, NCC
South Northants Council	Chacombe Flood Alleviation Scheme	£110k	£96k	£9k	0	Local community, SNC, NCC
Kettering Borough Council	Kettering Flood Storage Opportunity at Glendon Hall (Slade Brook)	£2,300k	0	0	£2,300k	KBC, developers, Anglian Water
East Northants DC	Highways scheme – Hemmington Road, Barnwell	£38k	£38k	0	0	NCC, S106
South Northants Council	Highways scheme – Ashton, Peterborough Road	£480k	0	£480k	0	NCC, S106
South Northants Council	Highways scheme – Banbury Road, Morton Pinkney	£38k	£38k	0	0	NCC, S106
South Northants Council	Highways scheme – Wappenham Road, Syresham	£480k	0	£480k	0	NCC, S106
Totals		£5,500k	£316k	£1,658k	£3,521k	

NB: Table is based on Scenario 2b

The longer term

There are numerous potential schemes that are not being put forward as part of the short term investment plan, but which could form part of the medium to long term investment process. A number of these are specifically related to future development and will be linked to the growth in terms of funding. Other schemes require further viability investigation into their costs and related benefits. Discussions with key partners any potential beneficiaries will be essential when moving forward with any potential medium and long-term schemes.

1. Flood Risk Management Funding and the Aims of this Investment Plan

Defra introduced Resilience Partnership Funding for Flood and Coastal Risk Management (FCERM) in May 2011. The new partnership funding policy means that central government money (Flood Defence Grant in Aid - FDGiA) is potentially available to meet the costs, partially or in full, of any worthwhile scheme, instead of meeting the full costs of just a limited number of schemes. The level of funding is now based on the outcomes and benefits being delivered. Funding can also be obtained to deliver required health and safety improvements on existing flood risk management assets. The Partnership Funding policy context and FDGiA processes are explained on [Defra's](#) and the [Environment Agency's](#) (EA) websites.

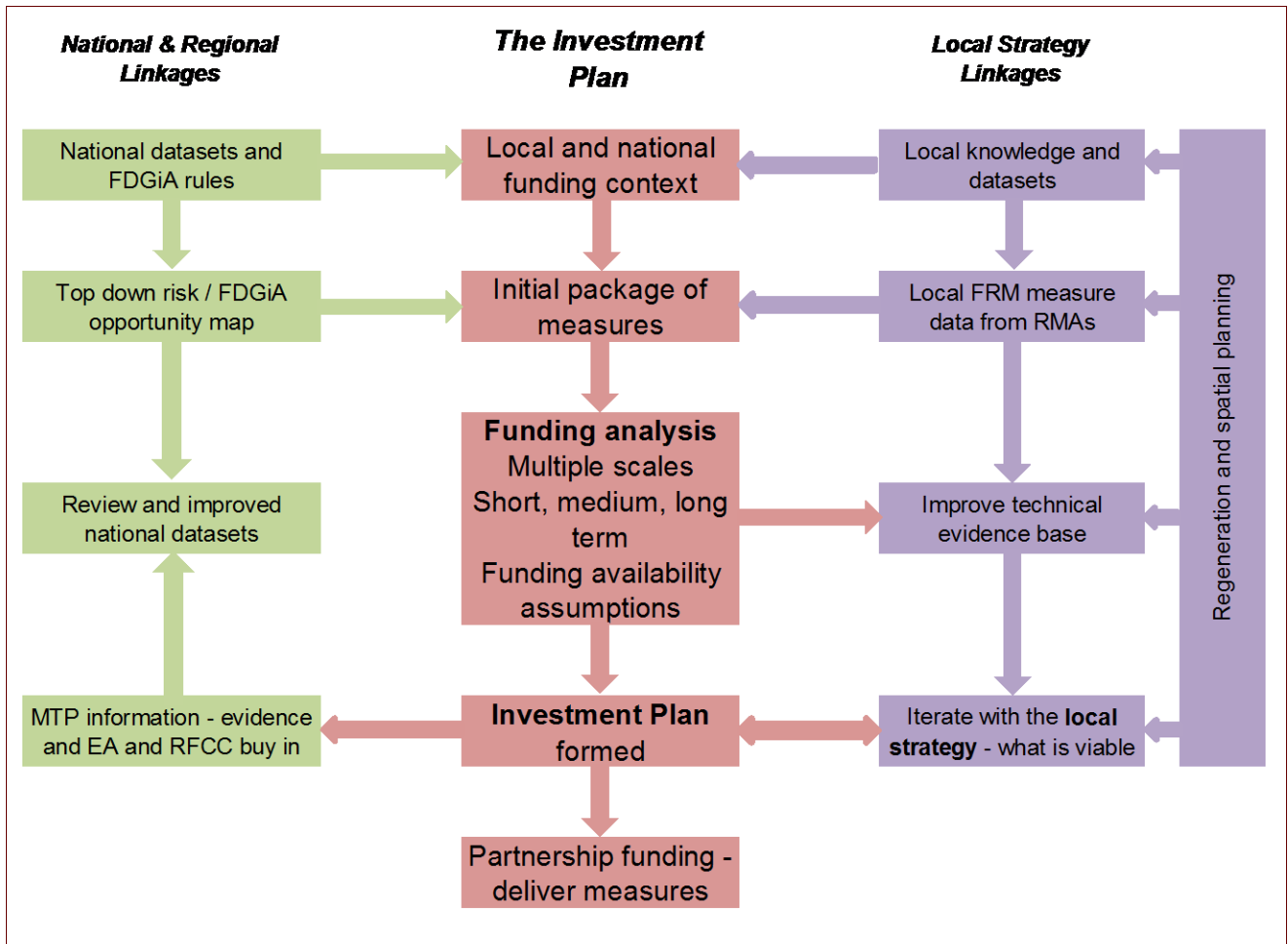
LLFAs now have a leadership role to oversee the delivery of all flood risk management in their area, and to support this, they are required under the Flood and Water Management Act 2010 (FWMA) to produce a Local Flood Risk Management Strategy. A Local FRM Strategy needs to grasp the opportunity to align stakeholders, particularly those with available funding, with those who would benefit from further investment in flood risk management. Within this process, developing options for the investment will need to test the local appetite for reducing the risk against willingness to meet any additional costs not covered by the central government support via Flood Defence Grant in Aid. With money comes influence: local democracy and engagement is vital. But the policy change is set against a backdrop of limited resources and low economic activity.

Hence, the Local FRM Strategy will require a strategic investment plan to ensure funding will be available to support the management of flood and coastal risks. In essence, the purpose of the investment plans would be to assess the challenges of funding local FRM projects, balancing the benefits of tackling each source of risk over time against the national and local costs of doing so. In explicitly trading-off appetite for risk against investment costs and affordability, it is hoped that the resulting Investment Plan will create:

- Good engagement amongst key decision makers, partners, communities and other stakeholders.
- More effective and transparent prioritisation between potentially competing projects throughout the county / district / borough and also between projects tackling different sources of risk.
- A compelling business case for external contributions and other local investment, by showing that relatively small amounts of local investment over time may have a big impact in terms of long-term residual risk for each sector and area, with implications for property and land values, and insurability.

The process to form an Investment Plan is presented below:

Figure 1 – The formation of an Investment Plan



2. The Local Vision for Investment in Flood Risk Management

Context

This Investment Plan has been prepared in July 2012, based on work between November 2011 and July 2012 when the draft Local Flood Risk Management (FRM) Strategy was under review by Risk Management Authorities. The chosen Investment Plan has been through one “iteration” and is based on an assessment of the most realistic way forward for investment in Northamptonshire at this time: this should be read as a draft Investment Plan requiring further work with Risk Management Authorities and consultation before it is finalised.

The Investment Plan includes:

- A list of candidate flood alleviation projects for investment in the short-term;
- Assessing the potential for these projects to receive national FDGiA funding;
- Where schemes are unlikely to be affordable, it suggests where a different approach may be needed, such as a reduced standard of protection or property resilience measures;
- A review of strategic medium and long-term investment options, for which further detail would need to be developed over time. This could be a key area for future iterations of the Investment Plan; and
- A description of how any identified funding gaps might be filled, either by drawing upon partners’ resources or pursuing wider sources of funding.

Overview of Flood Risk in Northamptonshire

There is a long history of flooding in Northamptonshire. The most significant event in recent years occurred on 10 April 1998, after heavy rainfall fell on already saturated ground in the county. Northampton and the surrounding areas were flooded due to a very heavy rainfall, channel exceedance, flood defence malfunction, surface water flooding and canal overtopping. In the town of Northampton alone, over 2,500 properties were flooded, two people died and 150 people were treated in hospital for flood related injuries and hypothermia. As a result, the flood defences through central Northampton were upgraded and now provide the town one of the highest design standards of protection in the country. As part of the data gathering exercise for the recently produced [Preliminary Flood Risk Assessment \(PFRA\) for Northamptonshire](#), approximately 450 historic flood events were recorded across the county dating back to 1947. These are reported to be a consequence of several factors, including under capacity of structures, surface water flooding and the overflowing of watercourses.

Northamptonshire has nearly 60,700 residential properties predicted currently to be at risk of surface water flooding (at least 0.1m deep) during an extreme rainfall event with an annual probability of 0.5% (1 in 200 year return period event). There are nearly 7,000 residential properties predicted to be affected by fluvial flood risk (from rivers) with a probability of at least 0.1% (1 in 1000 year return period event) across Northamptonshire and taking into consideration

defences. As a result of climate change, this risk to properties and life is likely to increase significantly in coming years if capital investment in flood risk management is not made. The Local FRM Strategy for Northamptonshire has been closely informed by existing policies, strategies, and assessments of flood risk, a list of which is provided in Appendix 4 of the Strategy.

Objectives for managing local flood risk

The Northamptonshire Local FRM Strategy has seven objectives:

1. Collaborative Approach – Adopt a collaborative approach to managing local flood risk by working with local partners and stakeholders to identify, secure and optimise resources, expertise and opportunities for reducing flood risk and increasing resilience to flooding;
2. Local Flood Risk – Develop a greater understanding of local flood risk by improving the scope of local knowledge and understanding of current and future local flood risks;
3. Enhance the natural 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 and promote the wellbeing of local people;
4. Preparedness and Resilience – Reduce the consequences of local flooding by promoting proactive actions and behaviour that embody preparedness and resilience to local flood risk;
5. Flood Risk and Development – Minimise the increase in local flood risk that may arise from new development by producing guidance, setting standards and supporting the development of local polices and guidance, discouraging wherever possible surface water runoff in new and future developments; and where possible influencing or supporting developments that seek to reduce existing flood risk;
6. Economically Sustainable Approach – Ensure the financial viability of schemes through the development of appropriate policies and assessment tools to ensure that flood risk management measures provide value for money whilst minimising the long-term revenue costs. Seeking to use natural processes where possible or source the costs of any maintenance from the financial beneficiaries of the development (S106);
7. Riparian Responsibilities – Encourage flood management activities by private owners of ordinary watercourses and flood defence structures as well as limit the development of constrictions on ordinary watercourses.

This Investment Plan specifically relates to and helps deliver Objective 1, 5 and especially Objective 6 – Economically Sustainable Approach. Specific actions which have been identified within the Local FRM Strategy Action Plan to achieve this objective include:

- LLFA to continue to develop and establish short and long term funding arrangements to deliver the requirements of the Flood and Water Management Act;
- LLFA to continue to bid for relevant funding as and when the opportunity arises to support future flood alleviation schemes i.e. Flood Defence Grant in Aid funding; and

- LLFA to ensure Infrastructure Development Plans, Community Infrastructure Strategy and Transport Infrastructure Plans are influenced by this Action Plan and that S106 (developer funding) is sought where considered necessary.

The progress of these actions will be monitored and reviewed on an annual basis.

This Investment Plan is also linked to the principles of reducing flood risk through new development and regeneration, and promoting the development of flood alleviation schemes in partnership with others, under Objective 5 of the Strategy.

3. Schemes, Priorities and Funding

Identification of schemes

In considering schemes for investment, a number of sources have been considered, including: schemes which have been previously submitted for FDGiA funding but have not been successful in receiving sufficient funding; schemes which have been recommended as a result of technical work within the county or region, such as Strategic Flood Risk Assessments and Water Cycle Strategies; schemes which would be required to facilitate future growth; and schemes identified by the county highways authority where improvements are required. These schemes have been categorised as short term (up to 3 years), medium term (3 to 15 years) and long term (after 15 years).

How priorities were identified

An assessment was undertaken as part of the Northamptonshire Community Flood Risk Summary (NCFRS) as part of the Northamptonshire Multi-Agency Flood Plan and to inform the Local Flood Risk Management Strategy. This methodology looks at flood risk from all sources. The methodology defines a prioritisation of locally important flood risk areas in Northamptonshire. The health, social, economic, environmental, infrastructure and psychological impacts of a range of flooding scenarios were assessed on a ward by ward basis, to determine those wards which would be most significantly impacted by flooding. A further assessment of the sensitivity of these wards to the impacts of climate change has provided a short-list 14 Highest Priority wards – those very high priority wards which are also very sensitive to climate change.

The results of the prioritisation assessment have been used to inform the priorities of the identified FRM schemes. In addition to the prioritisation assessment above, a number of the schemes have been increased in priority where there is local political incentive or pressure from communities due to a history of flooding to properties. This includes an assessment of the fluvial (river) schemes that are being considered by the EA. The EA were consulted on the prioritisation process.

Table 1 below sets out which schemes are proposed for the short term.

A number of additional schemes have been identified, but due to their cost or priority have not been included in the Investment Plan. It has been agreed with partners to review these schemes in the future when additional information, funding or resource become available. These include the Nene Locks Reversal, a scheme led by the EA mainly based on the need to address health and safety issues, which has a high cost of around £10m and would require significant external contributions whilst also only having a low benefit-cost ratio. In addition a number of the smaller highways authority schemes have not been included as they would not benefit from FDGiA funding. It was not considered that there were any grounds for packaging these schemes together, such as in specific geographic areas or serving a particular community or road network, as they were all spatially dispersed.

How sources of funding were identified

There are a number of different sources of funding for flood alleviation work, which are set out in Appendix 6 of the draft Local FRM Strategy. These range from public to private, European to national, regional and local sources, including both direct and indirect beneficiaries from flood alleviation schemes as suitable.

Table 1: Potential short term schemes list (3 years)

ID	Scheme name	Scheme description	Estimated scheme cost	No. of households benefiting	Local FRM Strategy priority	Potential local funding sources*	Partners*
01	Skew Bridge and Raunds Hog Dyke Culvert Improvements	Open up river channels and re-create river corridors, through increasing the size of culverts and active land use planning.	£1,712k	178	High	NCC, local community	EA, SNC, NCC
02	West End, Silverstone Flood Alleviation Scheme	Improvements to the Church Street culvert situated downstream of properties in West End Silverstone.	£149k	12	High	Local community, EA, SNC, NCC	NCC, SNC, EA
03	Kings Sutton Flood Alleviation Scheme	An embankment and floodwall works are likely to be most viable, plus new culverting and outfall.	£192k	17	High	Local community, EA, SNC, NCC	NCC, SNC, EA
04	Chacombe Flood Alleviation Scheme	Watercourse channel capacity improvements or attenuation are required.	£110k	14	Medium	Local community, EA, SNC, NCC	NCC, SNC, EA
11	Kettering Flood Storage Opportunity at Glendon Hall (Slade Brook)	300,000m ³ of storage on Slade Brook upstream of the railway culvert.	£2,300k	130	Medium	KBC, developers, Anglian Water, EA	KBC, NCC, developers, Anglian Water, EA
32	Highways scheme – Barnwell	Reconstruct culvert on Hemmington Road.	£38k	17	High	NCC, S106	NCC, LA, communities, EA
33	Highways scheme – Ashton	Rebuild downstream end of culvert on Peterborough road.	£480k	10	High	NCC, S106	NCC, LA, communities, EA
37	Highways scheme – Morton Pinkney	Rebuild end of arch and headwall of culvert on Banbury Road,.	£38k	10	High	NCC, S106	NCC, LA, communities, EA
42	Highways scheme – Syresham	Reconstruct culvert on Wappenham Road and resolve flooding issues.	£480k	10	Medium	NCC, S106	NCC, LA, communities, EA

*NCC = Northants County Council, SNC = South Northants Council, KBC = Kettering Borough Council.

What can be afforded

There are several aspects to this. Firstly, an understanding of the scale of the problem and the likely costs to address them is needed. The amount of funding support that can be accessed with modest or no reliance on local funding sources / local population can then be examined (most likely via FDGiA). The amount of “added value” gained by seeking local contribution (referred to as local partnership funds by EA / Defra) can be assessed and consideration given to the merits of alternative investment strategies with such monies. Finally, consultation can then be completed, confirming the appetite for investment in FRM and then the Investment Plan can be finalised.

In the past, most FCERM capital schemes have been built using Defra central government funding, known as Flood Defence Grant in Aid (FDGiA). Allocation of funding has been based on a national prioritisation. Local Levy (raised through the former Regional Flood Defence Committees, now Regional Flood and Coastal Committees) was allocated towards local priorities, including projects that could not attract FDGiA. Both sources of funding are approved by Regional Flood and Coastal Committees.

Clearly, access to FDGiA is vital for any substantial FRM investment programme. Planned spending on this is captured in the EA’s Medium Term Plan (or Sanctioned List). In order to attract FDGiA, projects need to be devised in order to achieve outcomes stated by Defra (Outcome Measures). Further details on this are included on the [EA website](#). The higher the Partnership Funding Score (score adjusted based on how much local partnership funding is to be provided) the more likely it is that FDGiA funding will be forthcoming. The Partnership Funding score is presented as a percentage and a value of over 100% may be sufficient to gain entry on the MTP and attract FDGiA to a project. However, in 2011-2012, the transitional year for the new partnership approach to funding, this worked out at 120%, and for 2012-2013 this appears likely to be 150% or more.

The main way that Partnership Funding scores are “topped up” at present is through RFCC Local Levy. RFCCs across the country currently take different approaches to how Local Levy should be allocated, for example this could be used to “top up” the cost of schemes that do not achieve full FDGiA funding, used to fully fund schemes that attract no FDGiA or used for maintenance activities. An RFCC can reallocate funding from higher scoring schemes to any project with a score above 100%.

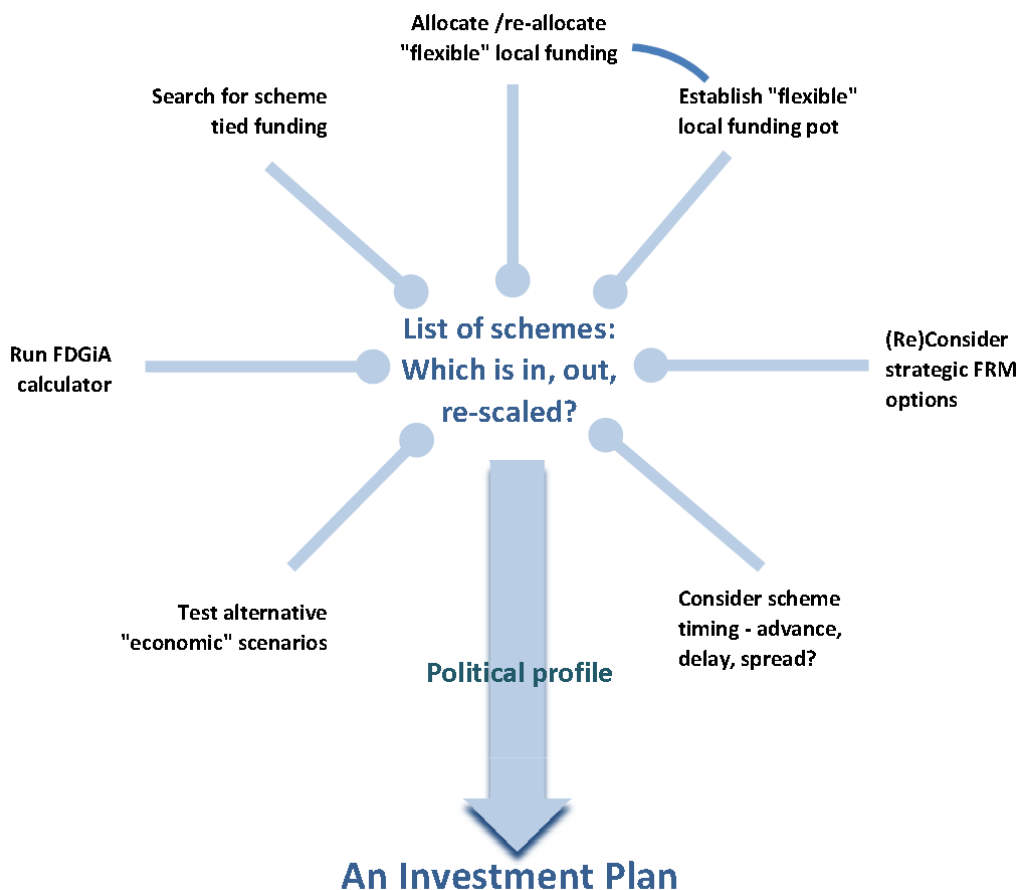
Now there is an emphasis on funding from external contributions towards schemes because FDGiA is allocated based on the benefits a scheme delivers, which may not cover the full costs. Even where FDGiA will cover these costs, there will still be a case to be made for local contributions, which will increase the overall amount of FDGiA that is available nationally go further and may also increase the amount of FRM funding available locally.

The amount of FDGiA and Local Levy is unknown until all bids have been received and processed by the Environment Agency and RFCCs, but it is possible to estimate short-term projections, based on an assumed Outcome Measure score threshold and an assumed amount of Local Levy that could be retained within Northamptonshire. The amount paid to each of the four RFCCs that covers Northamptonshire is set out in Appendix 6 of the draft Local FRM Strategy. By far the largest contribution is to the Anglian Northern RCCC, which covers the largest geographical area (£532,551 in 2010/11 and 2011/12). The total amount paid to the RFCCs is £581,693 (figures from 2010/11 and 2011/12).

Figure 2 below shows the themes considered when developing an Investment Plan and list of schemes that are to be promoted. The following terms need to be understood:

- The “FDGiA or Partnership Funding calculator” is an EA tool that can be used to determine how much FDGiA may be available for a scheme. It is available from the [EA’s website](#).
- “Flexible local funding” are funds that can be found locally and can be directed towards schemes of the LLFA (and its partners) choosing. This type of funding is very useful as it can be used to “top up” schemes to lever in funds such as FDGiA or can be used to fully fund strong local priorities. Local Levy is currently the best example of this. Could more flexible funding be found if communities and their political representatives were consulted and engaged? What impact would this have?

Figure 2 – Assessment Process Leading to an Investment Plan



Scenarios used to test investment choices

A range of scenarios has been used to test the potential viability of delivering the schemes listed in Table 1. They are:

1. Further **austerity**, poor local outlook and strong competition for FDGiA;
2. **As present**, including current Partnership Funding score needed to obtain FDGiA and RFCC Local Levy support in line with contributions made;
3. As above but having an **enhanced local contribution**; and

4. **Economic recovery**, with a lower FDGiA Partnership Funding score threshold and further enhanced local contributions.

The results of each of these scenarios can be found in Appendix A of this Investment Plan. In effect, each scenario has a number of assumptions, including the availability and sources of funding, set out in Appendix A and also timing, cost of schemes (detailed design work may not yet have taken place) and community support. The background and baseline data that supports this assessment is provided in Appendix B. Further iterations of this Investment Plan, for example on an annual basis, should aim to reduce this uncertainty, by using data from recent studies and by gauging local support for schemes gained through consultation.

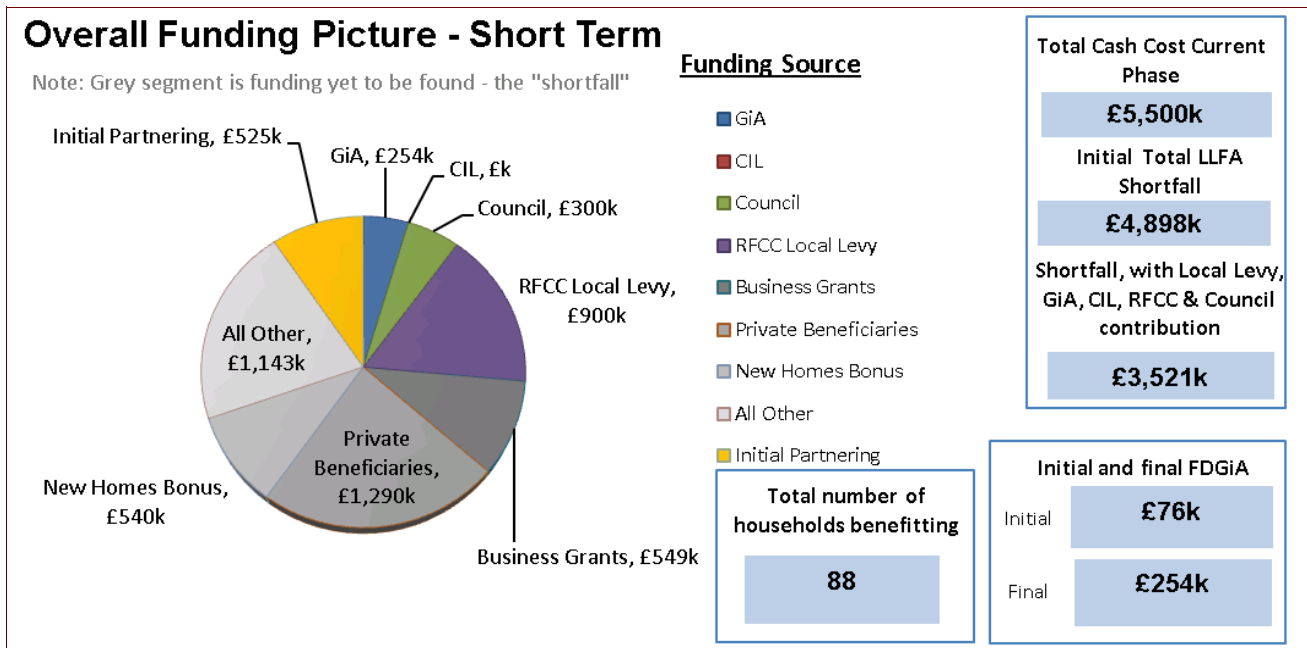
The most likely scenario for the short-term (over the next 3 years) is scenario 2b, as there is no evidence to suggest that FDGiA thresholds are going to reduce in the near future. The results from these scenarios are shown in the table below.

Table 2: Funding analysis for Scenario 2b (funding over 3 years)

FDGiA achieved (with OM score threshold of 150%)	£ 252k
Secured / highly likely local contribution	£1,658
Potential - Community Infrastructure Levy / other council led flexible development related funding	£ 0k
Potential - RFCC Local Levy	£ 900k
Potential - Other Contributions from the Council	£ 300k
Total Cash Cost of Short-Term Schemes (see Section 4 for details of schemes)	£ 5,500k
Total Shortfall / Further Local Funding to Secure	£ 3,521k

An investment tool has been run to assess how such sources of funding might map out in terms of investment in particular schemes and the remaining funding gap. The output from this is provided in Appendix C. The diagram below shows the distribution of funding for this scenario and where the funding gap might be filled. The tool provides us with a review of the potential distribution of certain sources of funding as below.

Figure 3: Pie chart distribution of sources of funding for the most likely scenario (2b)



A summary of different forms and sources of funding, which may be available to the County Council to fund the flood risk management measures, is provided in Appendix 6 of the Local FRM Strategy. Whilst the viability of securing the different sources of funding required to fill the shortfall identified above has not yet been established, there is an action within the Local FRM Strategy to “continue to bid for relevant funding as and when the opportunity arises to support future flood alleviation schemes”. This action is subject to resource availability.

4. The Investment Plan – Package of FRM Schemes

Short term schemes

Based on the scenarios and analysis presented in the previous section, Northamptonshire County Council, as Lead Local Flood Authority, aims to facilitate the delivery of the following schemes in the short term (next 3 years).

Table 3 – Indicative Financing of Schemes for Delivery

District / Borough	Scheme name	Scheme cost	Possible FDGiA	Secured or likely local government contribution	Funding gap to fill	Potential sources to fill gap
East Northants DC	Skew Bridge and Raunds Hog Dyke Culvert Improvements	£1,712k	£0k	£492k	£1,221k	Local community, EA, ENDC, NCC
South Northants Council	West End, Silverstone Flood Alleviation Scheme	£149k	£23k	£126k	0	Local community, NCC SNC
South Northants Council	Kings Sutton, Wales Street Flood Alleviation Scheme	£192k	£121k	£71k	0	Local community, SNC, NCC
South Northants Council	Chacombe Flood Alleviation Scheme	£110k	£96k	£9k	0	Local community, SNC, NCC
Kettering Borough Council	Kettering Flood Storage Opportunity at Glendon Hall (Slade Brook)	£2,300k	0	0	£2,300k	KBC, developers, Anglian Water
East Northants DC	Highways scheme – Hemmington Road, Barnwell	£38k	£38k	0	0	NCC, S106
South Northants Council	Highways scheme – Ashton, Peterborough Road	£480k	0	£480k	0	NCC, S106
South Northants Council	Highways scheme – Banbury Road, Morton Pinkney	£38k	£38k	0	0	NCC, S106
South Northants Council	Highways scheme – Wappenham Road, Syresham	£480k	0	£480k	0	NCC, S106
Totals		£5,500k	£316k	£1,658k	£3,521k	

Quick wins

The main quick wins that may be available to the County Council are the low cost highways schemes, not all of which are necessarily high priority. In addition to these, there are schemes which are already within the FDGiA MTP.

Flexible funding

There is an opportunity to get local levy allocated to schemes which would otherwise not be financially viable. The findings of this Investment Plan will inform discussions with the Local Partnership to support this.

How to turn the Investment Plan into an annual programme of works

The background work completed for this Investment Plan has highlighted the need to secure a range of sources of funding, including business grants and New Homes Bonus. Actions have been included within the Local FRM Strategy Action Plan to continue bidding for funding as well as influencing Community Infrastructure Strategies and Transport Infrastructure Plans, as and when they are developed. Where it is not possible to fill this funding gap then it will be necessary to investigate alternative solutions to reduce the costs of the schemes.

A number of schemes will require further investigation and pre-feasibility assessment to reduce the uncertainties within the Investment Plan. These investigations are highlighted in the Local FRM Strategy Action Plan.

Medium to long term

The schemes that are more likely to be delivered in the medium to long term are provided in Appendix D. In the medium term there are ten schemes: three of these are led by the EA; five are highways linked schemes; and two relate to facilitating future growth and development. There are a further 13 schemes currently identified for development in the long term.

The investment process will, no doubt, develop for the medium to long-term as formal processes and procedures are established. Also, in the medium-long term the funding picture becomes more uncertain, for example with respect to FDGiA and Local Levy.

A major emphasis will be placed on informing future infrastructure provision work (i.e. through robust S106 Agreements, Community Infrastructure Levy and Infrastructure planning)), by feeding into the planning policy process with all seven borough and district councils as well as the joint planning units. A number of medium and long-term schemes are directly related to facilitating future development and therefore the Lead Local Flood Authority will work with partners to influence planning applications and to seek betterment in locations where this is financially sustainable to do so. An example is for delivering a flood storage area upstream of Kettering.

[The Northamptonshire Climate Change Strategy 2010 – 2014](#) sets out a framework to:

1. Raise awareness of the issue of Climate Change and its impact on Northamptonshire
2. Reduce greenhouse gas emissions across the county
3. Plan for and adapt to the predicted impacts of Climate Change

For Northamptonshire the most noticeable impact of climate change to date is the increased frequency of severe weather events such as the floods at Easter 1998 and in July 2007, the exceptionally warm summer of 2003 and the snowfall of February 2009. The County Council Strategy is to:

- Prepare Multi Agency Flood Plans for each District in the county. These will define the more locally based actions and activities to be undertaken by each partner agency.
- Encourage sustainable drainage systems in new developments.
- Raise awareness of the steps that householders can take to protect their property from the impacts of flooding and of the technical advice available from English Heritage on flooding and historic buildings.
- Develop a Local Flood Risk Management Strategy to take the lead in managing surface water, ordinary watercourse and groundwater flood risk.
- Work with strategic planners to ensure that where all vulnerable development land is located away from floodplains and ensure that there is no inappropriate development on flood plains
- Promote more green space in towns and villages to capture rainwater and make long- term, sustainable use of land at risk of flooding.
- The Environment Agency will apply its supervisory role to manage various forms of flooding around the county and implement the actions outlined in the Catchment Flood Management Plans.

There will be financial challenges to delivering these requirements, however the Local Flood Risk Management Strategy sets out how each of these will be achieved in terms of funding and key partners that will need to be involved to deliver these actions.

Summary

Flood risk management is seen as a key priority by the County Council as it features in the [Cleaner, Greener, More Prosperous County Directorate Plan for the Authority](#). Although there is risk to a large number of properties, schemes identified to reduce this are modest in number and, in funding terms, relatively challenging to deliver.

As a result, the Local FRM Strategy Action Plan has highlighted the need for close partnership working in relation to funding and the need to continue to raise awareness with politicians and local communities, to make them aware of the fact they will be expected to contribute if they are a beneficiary to a flood alleviation scheme.

5. Action Plan

General dates and actions

The following diagram (Figure 4) summarises the process by which FDGiA is allocated by the EA and RFCCs on behalf of Defra, and the key dates in the process. FRM authorities need to submit their draft Medium Term Plans (MTPs) to the RFCC by mid July each year. In October the RFCC provide an indicative programme of works likely to receive FDGiA funding, with the final allocation approved in February.

A summary of the procedure for applying for grant and securing approval for flood risk management and coastal erosion studies, strategies and projects is provided by the EA on their [website](#).

Figure 5 summarises the key dates within the County Council's financial planning process – the Medium Term Financial Plan. The County Council introduced “star chambers” in 2008, with the expenditure decisions of its six directorates filtered through a number of smaller chambers before passing before a consolidated star chamber in the run-up to the setting of the annual budget. This process is an "essential tool", which can afford council politicians and officers the opportunity to do a fundamental line-by-line review of services and expenditure. The timescales fit well with the MTP process. Potential schemes and related costs will be identified early in the process and the required capital funding outlined. By the time the budget is tabled by cabinet, everyone involved will have been debating the issues for at least six months and will be aware of the required proposals and related costs and benefits, enabling informed decisions to be made. Star chambers therefore enhance the robustness of decision-making.

This Investment Plan will inform the FDGiA bidding process and will ensure that early and effective discussions take place, before key submission dates. These discussions will involve all relevant partners and stakeholders and in particular the EA, to ensure that they are aware of the LLFA's intentions for future funding bids. The NCC and FDGiA processes do align in terms of timescales and are considered to compliment the process.

Figure 4: FDGiA Allocation Diagram

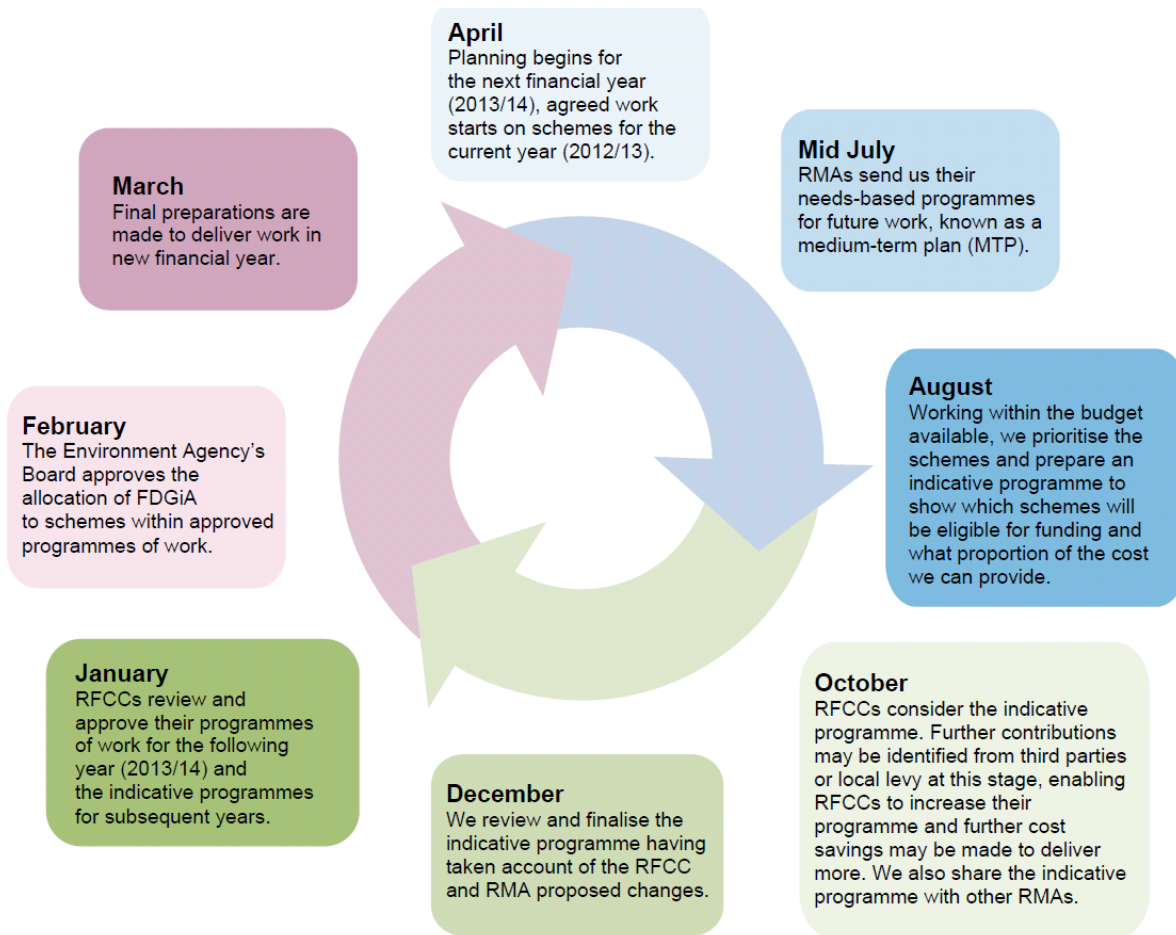
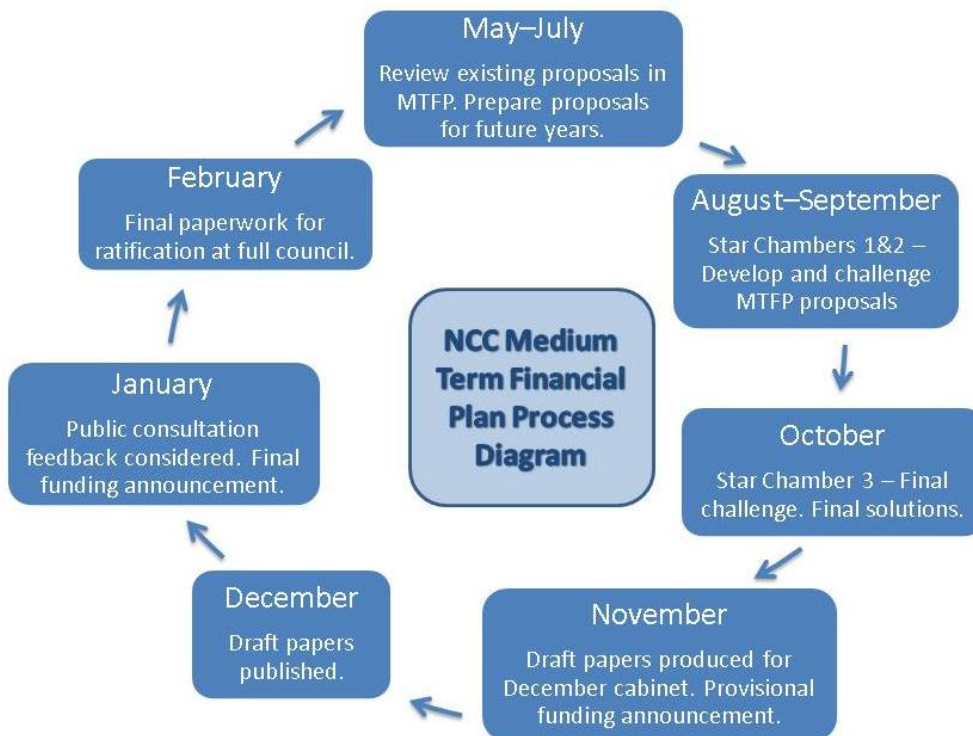


Figure 5: NCC Medium Term Financial Planning Diagram



Scheme level dates and actions

Table 4 contains a summary of the main actions needed to deliver the short-term schemes. These include actions to deliver scheme funding in the short term (identify timeline, sources of funding, risks, any agreements needed – partnerships, binding agreements etc.).

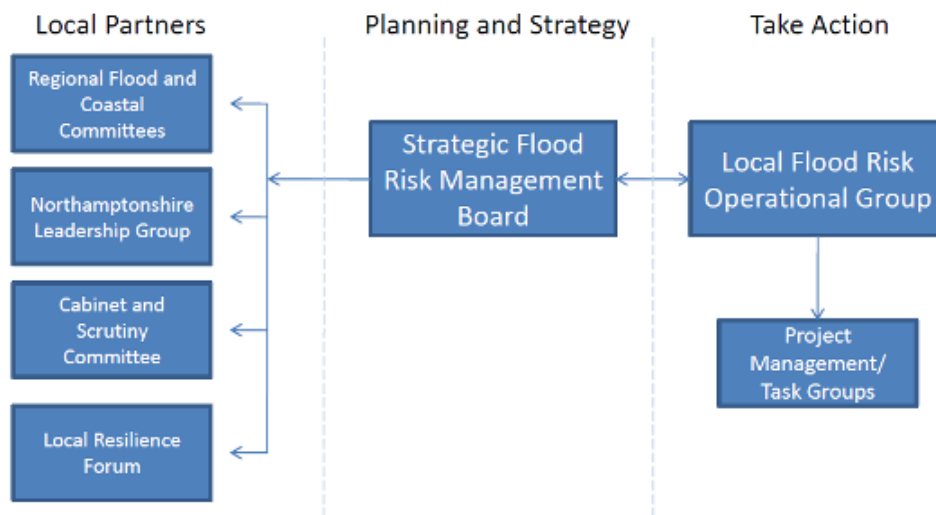
The first action for all short-term schemes is to consult with the key partners, in order to discuss and agree future actions. For the majority of the schemes, feasibility studies are required to explore funding opportunities and associated justification, reduce the technical uncertainties and to allow for FDGiA bids to be submitted. Some sources of funding identified by this Investment Plan will need to be investigated in further detail by the relevant partners, coordinated by the LLFA, to determine their viability. These investigations will then inform future actions.

Table 4: Matrix of scheme-level actions

Scheme	Consult partners?	Seek extra funding?	Technical development needed?	Confirm RFCC support?	Confirm financial support from borough/ district councils?	Key programme dates
Skew Bridge and Raunds Hog Dyke Culvert Improvements	Yes	Yes	Yes	Yes	Yes	Enter MTP 2014 PAR / RFCC sign off 2015 Design / construct 2016
West End, Silverstone Flood Alleviation Scheme	Yes	No	Yes	Yes	Yes	Enter MTP 2013 PAR / RFCC sign off 2014 Design / construct 2015
Kings Sutton, Wales Street (Black Brook) Flood Alleviation Scheme	Yes	No	Yes	Yes	Yes	Enter MTP 2013 PAR / RFCC sign off 2014 Design / construct 2015
Chacombe Flood Alleviation Scheme	Yes	No	Yes	Yes	Yes	Enter MTP 2013 PAR / RFCC sign off 2014 Design / construct 2015
Kettering Flood Storage Opportunity at Glendon Hall (Slade Brook)	Yes	Yes	Yes	Yes	Yes	Enter MTP 2014 PAR / RFCC sign off 2015 Design / construct 2016
Highways scheme – Hemmington Road, Barnwell	Yes	No	Yes	No	Yes	Enter MTP 2013 PAR / RFCC sign off 2014 Design / construct 2015
Highways scheme – Ashton, Peterborough road	Yes	No	Yes	No	Yes	Enter MTP 2013 PAR / RFCC sign off 2014 Design / construct 2015
Highways scheme – Banbury Road, Morton Pinkney	Yes	No	Yes	No	Yes	Enter MTP 2013 PAR / RFCC sign off 2014 Design / construct 2015
Highways scheme – Wappenham Road, Syresham	Yes	Yes	Yes	No	Yes	Enter MTP 2013 PAR / RFCC sign off 2014 Design / construct 2015

Management actions

The County Council has set out an organisational framework to initiate and progress the establishment of local partnership arrangements to support local flood risk management. The framework is intended to ensure that partnerships are managed in ways which enhance the co-ordination of policy and actions; and provide strong accountability and transparency i.e. a clear demonstration of cooperation and the 'added value' of partnership working. The following framework has been produced to coordinate partnership working and to address flood risk issues from all sources in Northamptonshire.



The Strategic Flood Risk Management Board considers strategic and national flood risk matters and comprises: Environment Agency (Chair), a County Council Cabinet member, Regional Flood and Coastal Committee Member Representatives, a Local Resilience Forum Representative, and the chair of the Local Flood Risk Operational Group. In terms of planning for flood risk investment, this group is charged with promoting a co-ordinated approach to flood and coastal risk management investment, including the planning and delivery of schemes across Northamptonshire.

The Local Flood Risk Operational Group enables the LLFA to fulfil its statutory roles and to determine the work programme, projects and issues to be considered by 'Task Groups'. Membership comprises NCC, borough and district councils, EA, County Highways Authority, the Highways Agency, Anglian Water Services, Northamptonshire Fire and Rescue, North Northamptonshire Joint Planning Unit, West Northamptonshire Joint Planning Unit, the Bedford Group of Drainage Boards, the county Emergency Planning, and the county environment unit. One of the key actions for the group is to identify new funding opportunities, more cost effective methods of joint working and ensure that the core skills, competencies and resources are safeguarded. The operational group will lead on the identification of different schemes and will support a coordinated bidding process with all partners.

There are a number of events which would act as triggers for change in the Investment Plan and associated actions. These include: changes to funding regimes, availability of funding, changes in political priorities, community pressure, new development, regeneration, revised assessments of flood risk, and changes in assessment methodology.

6. Formal adoption and sign-off

This version of the Investment Plan is considered to be a 'consultation draft'. Its aim is to present the range of ambition and the most likely outcome of flood risk management investment (a do minimum short term programme).

This Investment Plan has been developed in close collaboration with the Environment Agency. All other FRM partners have fed into this Investment Plan through their involvement with the development of the Local FRM Strategy. Through their membership of the Operational Group (see above), FRM partners have been able to provide information regarding proposed schemes and comment on the draft Local FRM Strategy, which includes all schemes within the Action Plan.

Consultation will be required with a range of other partners, including local politicians and internal finance teams to get their agreement. This consultation process would also enable ideas to be brought forward for generating more funding to deliver a more robust programme. This process would then inform later revisions of the Investment Plan and the Local FRM Strategy, in particular future actions required. The final investment plan will be signed off by the Strategic Flood Risk Management Board.

This section of the Investment Plan will be updated once a formal process for its approval is agreed with all parties, including the County Council, districts / boroughs, RFCC and other partners.

Appendices

Appendix A: “Funding Share” Tool Scenarios

A range of scenarios has been run, based on:

- **Scenario 1:** Harder times, poor local outlook and stiff competition for FDGiA;
- **Scenario 2a:** As present (assuming 130% FDGiA Outcome Measure score threshold);
- **Scenario 2b:** As present (assuming 150% FDGiA Outcome Measure score threshold);
- **Scenario 3:** Having an enhanced local contribution; and
- **Scenario 4:** Sunny outlook, with a lower FDGiA Outcome Measure score threshold and further enhanced local contributions.

Each scenario has a number of assumptions, including the availability and sources of funding. These are set out in Table A-1 below along with the results of the analysis.

For Scenario 2 (considered the most likely scenario), a range of methods for distributing flexible funding amongst the schemes were tested – for example, applying funding to those schemes with the smallest funding gap first, or to those schemes with the highest priority first, or based on the OM scores. It was found that these options have a negligible impact on the outcomes for Scenario 2.

Table A-1: Results of Funding Share Tool analysis

	Scenario 1	Scenario 2a	Scenario 2b	Scenario 3	Scenario 4
FDGiA OM Score threshold	180%	130%	150%	130%	100%
Community Infrastructure Levy	£ 0k	£ 0k	£ 0k	£ 1,100k	£ 825k
RFCC Local Levy	£ 275k	£ 900k	£ 900k	£ 900k	£ 900k
Other Contributions from the Council	£ 300k	£ 300k	£ 300k	£ 300k	£ 300k
Initial FDGiA [^]	£ 38k	£ 181k	£ 76k	£ 181k	£ 181k
Final FDGiA Obtained*	£ 135k	£ 332k	£ 254k	£ 415k	£ 1,141k
Total Cash Cost of Schemes	£ 5,500k	£ 5,500k	£ 5,500k	£ 5,500k	£ 5,500k
Total Final Shortfall	£ 4,266k	£ 3,443k	£ 3,521k	£ 2,260k	£ 1,809k
Schemes Funded	2, 3, 4, 32, 37	2, 3, 4, 32, 33, 37, 42	2, 3, 4, 32, 33, 37, 42	1, 2, 3, 4, 32, 33, 37, 42	1, 2, 3, 4, 32, 33, 37, 42
Schemes NOT Funded	1, 11, 33 (£28k shortfall), 42	1, 11	1, 11	11	11

[^]Prior to allocating funding shaded grey. *After allocating funding shaded grey.

Appendix B: “Tool Interface”

A standalone read-only version of the populated Tool Interface is available as an excel spreadsheet separate to this document.

Appendix C: Results of Funding Share Tool for Scenarios 2a, 2b and 3

The results of the sources of funding share for each scheme under the three most likely scenarios (2a, 2b and 3) are summarised in Tables C-1, C-2 and C-3 respectively below.

"Flexible funding contributions" includes the County Council's contributions and RFCC Local Levy. "Initial contributions" includes scheme-specific contributions already secured and highways-related funding.

Table C-1 Results of Funding Share Tool for each Scheme under Scenario 2a

Scheme ID	Total cash cost	Flexible funding contributions	FDGiA realised	Initial contributions	Shortfall
01	£1,712k	£495k	£0	£0	£1,217k
02	£149k	£96k	£53k	£0	£0
03	£192k	£82k	£98k	£12k	£0
04	£110k	£0	£105k	£5k	£0
11	£2,300k	£0	£0	£0	£2,300k
32	£38k	£0	£38k	£0	£0
33	£480k	£226k	£0	£254k	£0
37	£38k	£0	£38k	£0	£0
42	£480k	£226k	£0	£254k	£0
TOTAL	£5,500k	£1,125k	£332k	£525k	£3,517k

Table C-2 Results of Funding Share Tool for each Scheme under Scenario 2b

Scheme ID	Total cash cost	Flexible funding contributions	FDGiA realised	Initial contributions	Shortfall
01	£1,712k	£492k	£0	£0	£1,221k
02	£149k	£126k	£23k	£0	£0
03	£192k	£59k	£121k	£12k	£0
04	£110k	£0	£96k	£9k	£0
11	£2,300k	£0	£0	£0	£2,300k
32	£38k	£0	£38k	£0	£0

Scheme ID	Total cash cost	Flexible funding contributions	FDGiA realised	Initial contributions	Shortfall
33	£480k	£226k	£0	£254k	£0
37	£38k	£0	£38k	£0	£0
42	£480k	£226k	£0	£254k	£0
TOTAL	£5,500k	£1,129k	£316k	£529k	£3,521k

Table C-3 Results of Funding Share Tool for each Scheme under Scenario 3

Scheme ID	Total cash cost	Flexible funding contributions	FDGiA realised	Initial contributions	Shortfall
01	£1,712k	£1,629k	£83k	£0	£0
02	£149k	£96k	£53k	£0	£0
03	£192k	£82k	£98k	£12k	£0
04	£110k	£0	£105k	£5k	£0
11	£2,300k	£41	£0	£0	£2,259k
32	£38k	£0	£38k	£0	£0
33	£480k	£226k	£0	£254k	£0
37	£38k	£0	£38k	£0	£0
42	£480k	£226k	£0	£254k	£0
TOTAL	£5,500k	£2,300k	£415k	£525k	£2,259k

Figure C-1 below is a screenshot of the Funding Share Tool results for Scenario 2a, with scheme 3 highlighted for details of funding sources. From this screen shot it can be seen that it is recommended that the total shortfall of £3,517k is sought from the following sources:

- £548k from business grants;
- £1,289k from private beneficiaries;
- £539k from the New Homes Bonus; and
- £1,142k from other sources.

Figure C-2 below is a screenshot of the Funding Share Tool results for Scenario 2b, with scheme 3 highlighted for details of funding sources. From this screen shot it can be seen that it is recommended that the total shortfall of £3,521k is sought from the following sources:

- £549k from business grants;
- £1,290k from private beneficiaries;
- £540k from the New Homes Bonus; and
- £1,143k from other sources.

Figure C-3 below is a screenshot of the Funding Share Tool results for Scenario 3, with scheme 3 highlighted for details of funding sources. From this screen shot it can be seen that it is recommended that the total shortfall of £2,259k is sought from the following sources:

- £352k from business grants;
- £828k from private beneficiaries;
- £346k from the New Homes Bonus; and
- £734k from other sources.

Figure C-1: Funding Share Tool for Scenario 2a

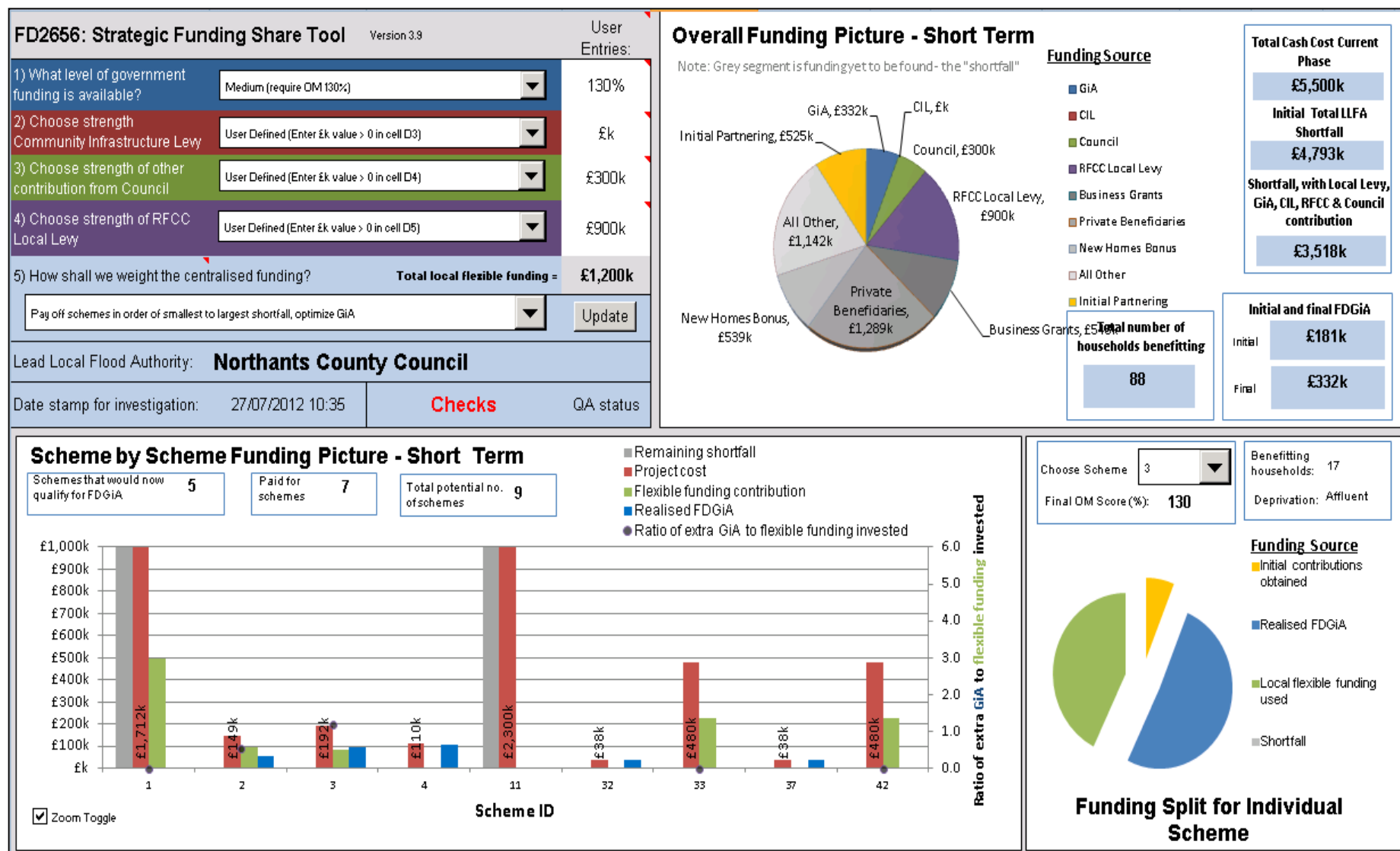


Figure C-2: Funding Share Tool for Scenario 2b

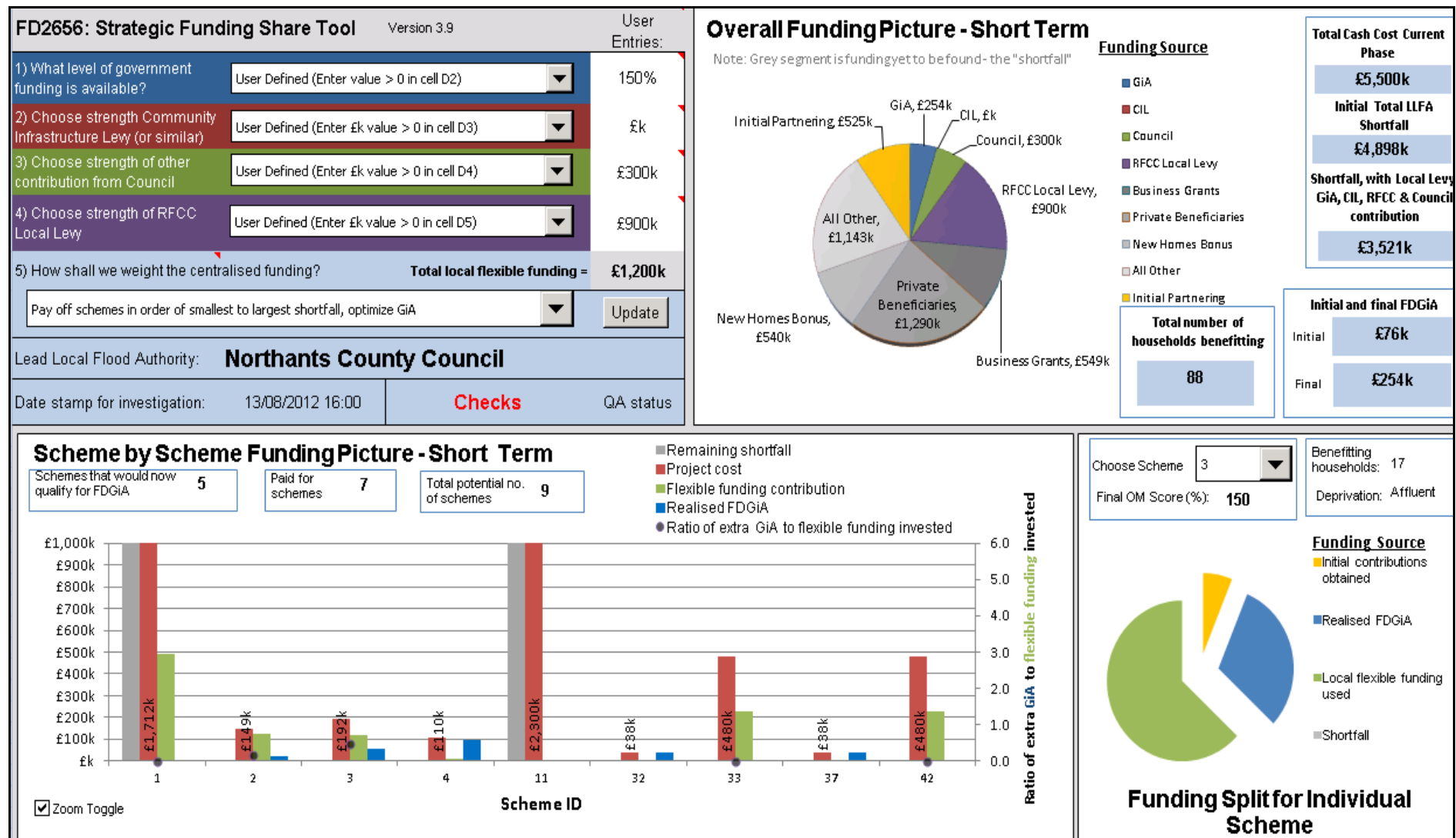
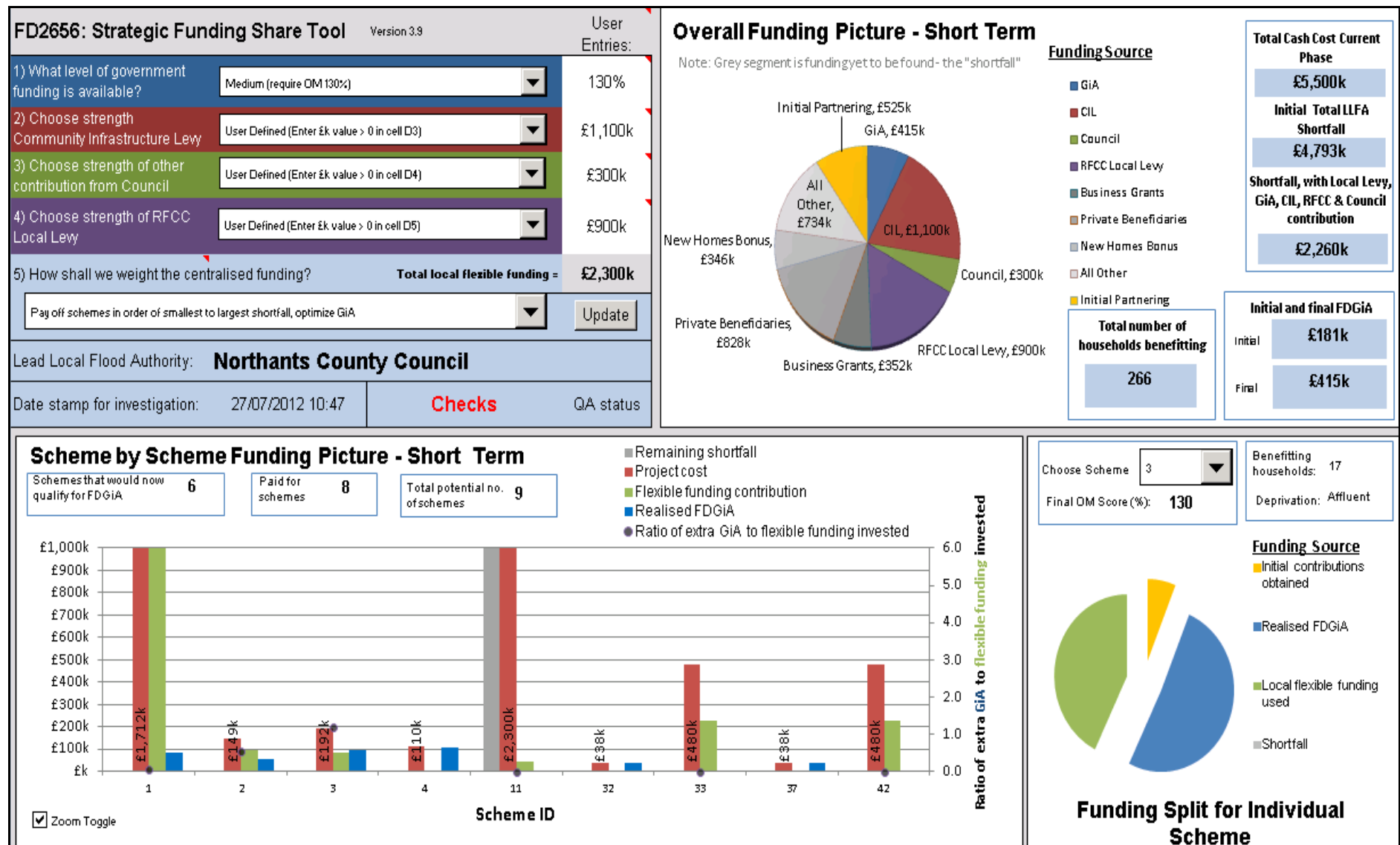


Figure C-3: Funding Share Tool for Scenario 3



Appendix D: Medium and Long Term Schemes

Table D1: Medium term schemes list

Scheme ID	Scheme name	Scheme cost	Initial Outcome Measure score	Adjusted Outcome Measure score	No. of households benefiting	Local FRM Strategy priority	Potential funding source	Partners
05	Nether Heyford Flood Alleviation Scheme - Capital Maintenance	£1,140 k	100%	100%	51	Medium	Local Community, FDGIA, EA, SNC, NCC, CIL	NCC, SNC
06	Islip Sluice and Weir Refurbishment	£1,280 k	100%	100%	unknown	High	Local Community, FDGIA, EA, ENDC, NCC	NCC, ENC
07	Yelvertoft Flood Alleviation Scheme	£126 k	132%	132%	190	High	Local Community, FDGIA, EA, DDC, NCC, CIL	DDC, NCC
18	Corby Culvert - Sewage Works additional storage and vegetation clearance	£205 k	73%	156%	26	High	CBC Cost Apportionment Mechanism, Growing Places fund	CBC, NNJPU, NCC, EA, DEFRA
23	Flood Storage between Weedon and Kislingbury to mitigate future flood risk to downstream Northampton.	£6,400 k	143%	143%	2558	Medium	Partnership, FDGiA	EA, NCC, SNC, DDC
31	East Street, Long Buckby - drainage issues along whole length of road	£4 k	2331%	2331%	30	Medium	Capital/ revenue funding from NCC, S106	NCC, LA, WC, Communities
34	Hall Yard, Kingscliffe New drainage along whole length of road.	£4 k	1053%	1053%	10	Medium	Capital/ revenue funding from NCC, S106	NCC, LA, WC, Communities

Scheme ID	Scheme name	Scheme cost	Initial Outcome Measure score	Adjusted Outcome Measure score	No. of households benefiting	Local FRM Strategy priority	Potential funding source	Partners
44	43 - 53 Berry Lane, Wootton - improve drainage	£ 48 k	117%	117%	11	High	Capital/ revenue funding from NCC, S106	NCC, LA, WC, Communities
45	Holcot Lane, Overstone Road roundabout to 30 signs, Sywell - Repair drainage	£ 48 k	304%	304%	15	High	Capital/ revenue funding from NCC, S106	NCC, LA, WC, Communities

Table D2: Long term schemes list

Scheme ID	Scheme name	Scheme cost	Initial Outcome Measure score	Adjusted Outcome Measure score	No. of households benefiting	Local FRM Strategy priority	Potential funding source	Partners
10	Thorpe Malsor and Cransley Reservoirs Catchment Storage Facility	£ 4,000k	29%	29%	103	High	NN JPU, NCC, EA, DEFRA, Developer contribution	NN JPU, NCC, EA, DEFRA, Developer
13	Harrowden Brook Flood Storage Reservoir, Wellingborough	£ 920k	28%	28%	6	Low	NN JPU, NCC, EA, DEFRA, Developer contribution	NN JPU, NCC, EA, DEFRA, Developer
14	Swanspool Brook, Wellingborough Flood Storage Reservoir	£ 1,840k	45%	45%	127	High	NN JPU, NCC, EA, DEFRA, Developer contribution	NN JPU, NCC, EA, DEFRA, Developer

Scheme ID	Scheme name	Scheme cost	Initial Outcome Measure score	Adjusted Outcome Measure score	No. of households benefiting	Local FRM Strategy priority	Potential funding source	Partners
15	Willow Brook Central West culvert replacement and new channel	£ 858k	45%	45%	39	Low	CBC Cost Apportionment Mechanism	NN JPU, NCC, EA, DEFRA
20	Attenuation Storage for Waterside development Brampton Branch and St Peter's Way	£ 821k	2%	2%	2	Medium	NBC, Developer, regeneration funding	NBC, NCC, AWS, EA, developers
21	Attenuation storage at either Becketts Park, Avon Nunn Mills Ransome Road, Southbridge West or Nene Meadows	£ 400k	19%	19%	2	Medium	NBC, Developer, regeneration funding	NBC, NCC, AWS, EA, developers
24	Development of flood storage upstream on Dallington Brook	£ 920k	0%	0%	0	High	Developer, potential SAB (maintenance)	EA, NCC, WN JPU, NBC, DDC
27	Northampton South SUE Flood attenuation measures	£ 1,808k	1%	1%	0	High	Developer, potential SAB (maintenance)	Developer, SNC, NCC, WN JPU
28	Northampton North SUE Flood attenuation measures	£ 1,808k	0%	0%	0	High	Developer, potential SAB (maintenance)	Developer, NCC, DDC, WN JPU
29	Brackley East SUE Flood attenuation measures	£ 1,808k	0%	0%	0	Medium	Developer, potential SAB (maintenance)	Developer, NCC, SNC, WN JPU
30	Highways Scheme – Swinford Road, Stanford	£ 480k	4%	4%	3	High	NCC, S106	NCC, LA, WC, Communities

Scheme ID	Scheme name	Scheme cost	Initial Outcome Measure score	Adjusted Outcome Measure score	No. of households benefiting	Local FRM Strategy priority	Potential funding source	Partners
35	Highways Scheme – Pipewell Road, Rushton	£ 38k	86%	86%	0	High	NCC, S106	NCC, LA, WC, Communities
43	Highways Scheme – Park Avenue North No. 12 (Rowan Cottage) to No. 1, Paulerspury	£ 48k	93%	93%	12	Medium	NCC, S106	NCC, LA, WC, Communities
44	Highways Scheme – 43 - 53 Berry Lane, Wootton	£ 48k	117%	117%	11	High	NCC, S106	NCC, LA, WC, Communities
45	Highways Scheme – Holcot Lane, Overstone Road roundabout to 30 signs, Sywell	£ 48k	304%	304%	15	High	NCC, S106	NCC, LA, WC, Communities
46	Highways Scheme – Mill Cottage to junction with Finedon Station Road and Station Road, Burton Latimer	£ 48k	120%	120%	10	High	NCC, S106	NCC, LA, WC, Communities