

#135

COMPLETE

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Page 1

Q1 I agree to the Council collecting my personal data so that they can process my reply to the Northampton Local Plan (Part 2) Proposed Submission Draft Regulation 19. **I agree**

Page 2: Part A: Personal Details

Q2 Please provide your contact details in the boxes below. If you are an agent acting for another, please enter your client's details.

Name (required)	MALCOLM BALL
Job title (if appropriate)	DRAINAGE ENGINEER
Organisation (where relevant)	LLFA
Address 1 (required)	ANGEL SQUARE
Address 2	ANGEL STREET
Town	NORTHAMPTON
Postcode (required)	NN1 1ED
Email Address	[REDACTED]
Phone Number	[REDACTED]

Q3 Are you making this representation as: **Local Authority or Town/Parish Council**

Q4 Please enter type of organisation (for example, planning consultant, etc.)

Northamptonshire County Council Lead Local Flood Authority

Page 3: Agent details

Q5 Please enter your details below: **Respondent skipped this question**

Page 4: Part B: Representation(s)

Q6 Do you consider the Northampton Local Plan Part 2 to be legally compliant? **Yes**

Page 5: Part B: Legal Compliance

Q7 Do you consider the document to be not legally compliant because it is: (please tick all that you think apply) **Respondent skipped this question**

Page 6: Part B: Soundness

Q8 Do you consider the Northampton Local Plan Part 2 to be sound? **Yes**

Page 7: Part B: Soundness

Q9 Do you consider the document to not be sound because it is: (please tick all that you think apply) **Respondent skipped this question**

Page 8: Part B: Representation(s) - Local Plan Part 2 draft

Q10 To which part of the Local Plan does this representation relate?

Paragraph number **85**

Q11 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Paragraph 85 makes reference to the Easter flood of 1998. Whilst we accept this was a momentous event the flooding of over 180 dwellings and industrial properties due to surface water flooding in Northampton Borough during 2018 is a more recent reminder of the risk to the Borough from surface water flooding

Q12 Do you wish to comment on other parts of the draft Local Plan? **Yes**

Page 9: Part B: Representation(s) - Local Plan Part 2 draft (2/20)

Q13 To which part of the Local Plan does this representation relate?

Policy number **6**

Q14 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Following the events of 1998, fluvial flood defence structures were constructed within the borough to the 1 in 200 year standard. Within the Upper Nene Catchment Local standards for surface water drainage of the same 1 in 200 year standard with an additional allowance for climate change were imposed to protect against pluvial flooding. Nationally, the 1 in 200 year standard is exceptional. We would note that the Upper Nene Catchment 1 in 200 year plus an allowance for climate change which encompasses the majority of the Borough of Northampton is not mentioned anywhere within the document.

We would request that the Upper Nene Catchment standard for surface water drainage is incorporated within paragraphs 93-96

Q15 Do you wish to comment on other parts of the draft Local Plan? **Yes**

Page 10: Part B: Representation(s) - Local Plan Part 2 draft (3/20)

Q16 To which part of the Local Plan does this representation relate?

Paragraph number **96**

Q17 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

We welcome the inclusion within the Local Plan of the Local Standards and Guidance for Surface Water Drainage in Northamptonshire.

However we note that paragraph 96 states 'The guide is designed to assist developers in the design of a surface water drainage system and to support local planning authorities in considering drainage proposal for new developments'

We would request that the paragraph emphasises the requirement of a surface water drainage system to meet the national and local standards as required of the document.

We would suggest the paragraph states, The guide is designed to assist developers in the design of a surface water drainage system in order to meet the required local standards and to support local planning authorities in considering drainage proposal for new developments'

Q18 Do you wish to comment on other parts of the draft Local Plan? **Yes**

Page 11: Part B: Representation(s) - Local Plan Part 2 draft (4/20)

Q19 To which part of the Local Plan does this representation relate?

Policy number **6**

Q20 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Policy 6 determines that proposals that do not increase flood risk will be supported. Whilst the aim of the Local Standards is just that, the status quo is the baseline. Developments are required to consider flood risk, mitigate and where possible reduce flood risk. Brownfield sites are required to reduce discharge of surface water from the site by 40%. This betterment is likely to be increased in the near future to a reduction to greenfield run off rates in line with restrictions placed on discharge of surface water sewers by Anglian Water from brownfield sites into Anglian Water owned surface water sewers.

We believe Policy 6 should require that development will not increase flood risk, will, where possible, reduce the risk of flooding and for previously developed land, Brownfield sites, provide a betterment in regards surface water discharge from the development in accordance with local standards.

We note Policy 12. From the list of proposed developments, the majority of the proposed sites will be classified as major development however 10% of development is classified as minor development, being less than 10 dwellings. The accumulative effect of windfall sites of less than 10 dwellings in regards flood risk is not considered within the Local Plan. Sustainable drainage solutions are available for all size of development.

We would request that Policy 6 requires that all development incorporate sustainable drainage systems.

Q21 Do you wish to comment on other parts of the draft Local Plan? **Yes**

Page 12: Part B: Representation(s) - Local Plan Part 2 draft (5/20)

Q22 To which part of the Local Plan does this representation relate?

Policy number **34-38**

Q23 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

We note the Site Specific Policies 34-38. We would request that each policy requires the submission of a site specific Flood Risk Assessment.

Policy 37 omits the requirement of a sustainable drainage system as is required of Policies 34, 35, 36 and 38

Policy 34, 35, 37 and 38 should make reference to the Upper Nene Catchment standard of 1 in 200 years plus an allowance for climate change for surface water drainage

Q24 Do you wish to comment on other parts of the draft Local Plan? **No**

Page 13: Part B: Representation(s) - Local Plan Part 2 draft (6/20)

Q25 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q26 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Respondent skipped this question

Q27 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 14: Part B: Representation(s) - Local Plan Part 2 draft (7/20)

Q28 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q29 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Respondent skipped this question

Q30 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 15: Part B: Representation(s) - Local Plan Part 2 draft (8/20)

Q31 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q32 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Respondent skipped this question

Q33 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 16: Part B: Representation(s) - Local Plan Part 2 draft (9/20)

Q34 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q35 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Respondent skipped this question

Q36 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 17: Part B: Representation(s) - Local Plan Part 2 draft (9/20)

Q37 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q38 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Respondent skipped this question

Q39 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 18: Part B: Representation(s) - Local Plan Part 2 draft (10/20)

Q40 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q41 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Respondent skipped this question

Q42 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 19: Part B: Representation(s) - Local Plan Part 2 draft (11/20)

Q43 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q44 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Respondent skipped this question

Q45 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 20: Part B: Representation(s) - Local Plan Part 2 draft (12/20)

Q46 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q47 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Respondent skipped this question

Q48 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 21: Part B: Representation(s) - Local Plan Part 2 draft (13/20)

Q49 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q50 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Respondent skipped this question

Q51 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 22: Part B: Representation(s) - Local Plan Part 2 draft (14/20)

Q52 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q53 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Respondent skipped this question

Q54 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 23: Part B: Representation(s) - Local Plan Part 2 draft (15/20)

Q55 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q56 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Respondent skipped this question

Q57 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 24: Part B: Representation(s) - Local Plan Part 2 draft (16/20)

Q58 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q59 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Respondent skipped this question

Q60 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 25: Part B: Representation(s) - Local Plan Part 2 draft (17/20)

Q61 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q62 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Respondent skipped this question

Q63 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 26: Part B: Representation(s) - Local Plan Part 2 draft (18/20)

Q64 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q65 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Respondent skipped this question

Q66 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 27: Part B: Representation(s) - Local Plan Part 2 draft (19/20)

Q67 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q68 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Respondent skipped this question

Q69 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 28: Part B: Representation(s) - Local Plan Part 2 draft (20/20)

Q70 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q71 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Respondent skipped this question

Page 29: Part B: Representation(s) - Sustainability Appraisal

Q72 Do you wish to comment on the Sustainability Appraisal?

No

Page 30: Part B: Representation(s) - Sustainability Appraisal

Q73 To which part of the Sustainability Appraisal does this representation relate?

Respondent skipped this question

Q74 Comments

Respondent skipped this question

Q75 Do you wish to comment on other parts of the Sustainability Appraisal?

Respondent skipped this question

Page 31: Part B: Representation(s) - Sustainability Appraisal (2/6)

Q76 To which part of the Sustainability Appraisal does this representation relate?

Respondent skipped this question

Q77 Comments

Respondent skipped this question

Q78 Do you wish to comment on other parts of the Sustainability Appraisal?

Respondent skipped this question

Page 32: Part B: Representation(s) - Sustainability Appraisal (3/6)

Q79 To which part of the Sustainability Appraisal does this representation relate?

Respondent skipped this question

Q80 Comments

Respondent skipped this question

Q81 Do you wish to comment on other parts of the Sustainability Appraisal?

Respondent skipped this question

Page 33: Part B: Representation(s) - Sustainability Appraisal (4/6)

Q82 To which part of the Sustainability Appraisal does this representation relate? Respondent skipped this question

Q83 Comments Respondent skipped this question

Q84 Do you wish to comment on other parts of the Sustainability Appraisal? Respondent skipped this question

Page 34: Part B: Representation(s) - Sustainability Appraisal (5/6)

Q85 To which part of the Sustainability Appraisal does this representation relate? Respondent skipped this question

Q86 Comments Respondent skipped this question

Q87 Do you wish to comment on other parts of the Sustainability Appraisal? Respondent skipped this question

Page 35: Part B: Representation(s) - Sustainability Appraisal (6/6)

Q88 To which part of the Sustainability Appraisal does this representation relate? Respondent skipped this question

Q89 Comments Respondent skipped this question

Page 36: Part B: Representation(s) - Habitats Regulation Assessment

Q90 Do you wish to comment on the Habitats Regulation Assessment? No

Page 37: Part B: Representation(s) - Habitats Regulations Assessment

Q91 To which part of the Habitats Regulations Assessment does this representation relate? Respondent skipped this question

Q92 Comments Respondent skipped this question

Q93 Do you wish to comment on other parts of the Habitats Regulations Assessment? Respondent skipped this question

Page 38: Part B: Representation(s) - Habitats Regulations Assessment (2/6)

Q94 To which part of the Habitats Regulations Assessment does this representation relate?

Respondent skipped this question

Q95 Comments

Respondent skipped this question

Q96 Do you wish to comment on other parts of the Habitats Regulations Assessment?

Respondent skipped this question

Page 39: Part B: Representation(s) - Habitats Regulations Assessment (3/6)

Q97 To which part of the Habitats Regulations Assessment does this representation relate?

Respondent skipped this question

Q98 Comments

Respondent skipped this question

Q99 Do you wish to comment on other parts of the Habitats Regulations Assessment?

Respondent skipped this question

Page 40: Part B: Representation(s) - Habitats Regulations Assessment (4/6)

Q100 To which part of the Habitats Regulations Assessment does this representation relate?

Respondent skipped this question

Q101 Comments

Respondent skipped this question

Q102 Do you wish to comment on other parts of the Habitats Regulations Assessment?

Respondent skipped this question

Page 41: Part B: Representation(s) - Habitats Regulations Assessment (5/6)

Q103 To which part of the Habitats Regulations Assessment does this representation relate?

Respondent skipped this question

Q104 Comments

Respondent skipped this question

Q105 Do you wish to comment on other parts of the Habitats Regulations Assessment?

Respondent skipped this question

Page 42: Part B: Representation(s) - Habitats Regulations Assessment (6/6)

Q106 To which part of the Habitats Regulations Assessment does this representation relate?

Respondent skipped this question

Q107 Comments

Respondent skipped this question

Page 43: Part B: Representation(s) - Examination

Q108 If your representation is seeking a change, do you consider it necessary to take part and speak at the examination hearing(s) if invited to do so by the Inspector?

No

Q109 If you wish to take part at the oral examination, please outline why you consider this to be necessary (please note the Inspector will determine who will be invited to be heard at the examination hearing(s))

Respondent skipped this question

Q110 Do you wish to be notified when:

The Council submit the Northampton Local Plan (Part 2) to the Government?

,

The Northampton Local Plan (Part 2) is adopted by the Council

Page 44: Equality Monitoring

[REDACTED]

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