From: Patience Stewart

Sent: 04 June 2019 11:44

To: Planning Policy

Subject: Northampton Part 2 Local Plan Submission Consultation

Attachments: FINAL_Representation_Form Policy 38.docx; FINAL_Representation_Form Policy 32.docx; FINAL Representation Form Policy 33.docx; FINAL Representation Form

Policy 34.docx; FINAL_Representation_Form Policy 35.docx;

FINAL_Representation_Form Policy 36.docx; FINAL_Representation_Form Policy 37.docx; FINAL_Representation_Form Policy 5.docx; FINAL_Representation_Form

Policy 6.docx; FINAL_Representation_Form Policy 36.docx

Dear Sir/Madam,

Thank you for the opportunity to comment on the Northampton Local Plan Part 2 Proposed Submission Consultation. The attached representation forms are submitted on behalf of Anglian Water.

I would be grateful if you could confirm that you have received the attached forms.

Should you have any gueries relating to this response please let me know.

Regards,
Stewart Patience
Spatial Planning Manager

Spatial Planning Manager

Anglian Water Services Limited

Mobile:

Thorpe Wood House, Thorpe Wood, Peterborough, PE3 6WT

www.anglianwater.co.uk

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Anglian Water Services Limited

Registered Office: Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon,

Cambridgeshire, PE29 6XU

Registered in England No 2366656

Please consider the environment before printing this email.



Northampton Borough Council is preparing a Local Plan Part 2 for the Borough which will supplement the West Northamptonshire Joint Core Strategy and will replace Saved Policies in the Northampton Borough Council Local Plan (1997). The Local Plan Part 2 will cover the period to 2029. This stage is the Proposed Submission Draft Local Plan Part 2 (Regulation 19) and is the version of the plan that the Council intends to submit to the Planning Inspectorate for independent examination.

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A downloadable version (MS Word) is also available on the same page.

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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.



Please co Response		
This form	(For official use onl	
Part A	(1 of official asc offi	
Part B	Your representation(s). Please fill in a separate sheet for each rep make	resentation you wish to
Part A: Pe	ersonal Details	
Q1: Are y appropria	ou making this representation as? (Please tic te)	k as
a) Res	sident or member of the general public	
b) Loc	al Authority or Town/Parish Council	
c) Lar	ndowner	
d) Age	ent / Consultant (on behalf of)	
e) Oth	er organisation (please specify which type of org	anisation below):
Water ar	nd sewerage company	
*If on a	egent is appointed please complete only the Title	Nome and Organization

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First name	Stewart	
Last name	Patience	
Job title (where relevant)	Spatial Planning Manager	
Organisation (where relevant)	Anglian Water Services Ltd	
Address line 1	Thorpe Wood House	
Line 2	Thorpe Wood	
Line 3		
City / Town	Peterborough	
County		
Postcode	PE3 6WT	

Telephone number	
Email (if provided we will always contact you this way)	

Part B: Representation(s)

Please use a separate sheet for each representation

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Please note all comments will be made publicly available. If you do not have sufficient space in the box, please continue on a separate sheet or expand the box.

2: Do you consider the Northampton Local Plan Part 2	Yes	✓	No				
to be legally compliant?							
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2 (1): Please give details of why you consider the Northampton Local Plan Part 2 Submission Draft document is not legally compliant. Please be as precise as possible.							
3: Do you consider the Northampton Local Plan Part 2 to be sound?	200		No		✓		
	3 (1): If NO, is this because it is: (please tick all that you think apply)						
Not positively prepared							
Not justified							
Not effective ✓							
Not consistent with national policy							

Policy

Policies

4: To which part of the Local Paragraph

Plan does this representation relate?	number	number	Maps
		5	

4 (1): 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 understand that the Environment Agency considers that the area served by Anglian Water is an area of serious water stress as defined in the Environment Agency 2013 'Water stressed areas final classification report'. Therefore we would fully support the optional water efficiency standard being applied within the Northampton Local Plan area.

Anglian Water as a water company is keen to encourage increased water efficiency/re-use as part of new residential developments. To support this we are offering financial incentives for residential developers that demonstrate that water use would be 100 litres/per person/per day at the point of connection.

As outlined in our current Developer charges the fixed element of zonal charge for water supply would be waived where this can be demonstrated. We are also actively working with developers to install green water systems in new homes including rainwater/stormwater harvesting and water recycling systems. Further details of Anglian Water's approach to green water proposals is available to view at:

https://www.anglianwater.co.uk/developers/green-water.aspx

It is therefore proposed that Policy 5 be amended as follows:

'For residential development, proposals should demonstrate that dwellings meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, as set out in Building Regulations Part G2

Water reuse and recycling and rainwater and stormwater harvesting and other suitable measures should be incorporated wherever feasible to reduce demand on mains water supply.'

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested changes, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

SUSTAINABILITY APPRAISAL

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Comments				
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When the report of any person appointed to carry out an independent examination of Northampton Local Plan Part 2 is published	11.00
When the Northampton Local Plan Part 2 has been adopted	✓
Other (please specify)	

10: Signature	Stewart Patience	Date	3 rd June 2019

Thank you for taking the time to complete the form.

Please return it to:

By **post** or by **hand** to:

Northampton Borough Council

Planning Policy The Guildhall St Giles Square Northampton NN1 1DF



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Part A	(1 of official asc offi	
Part B	Your representation(s). Please fill in a separate sheet for each rep make	resentation you wish to
Part A: Pe	ersonal Details	
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e) Oth	er organisation (please specify which type of org	anisation below):
Water ar	nd sewerage company	
*If on a	egent is appointed please complete only the Title	Nome and Organization

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First name	Stewart	
Last name	Patience	
Job title (where relevant)	Spatial Planning Manager	
Organisation (where relevant)	Anglian Water Services Ltd	
Address line 1	Thorpe Wood House	
Line 2	Thorpe Wood	
Line 3		
City / Town	Peterborough	
County		
Postcode	PE3 6WT	

Telephone number		
Email (if provided we will always contact you this way)	o	

Part B: Representation(s)

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Not effective				
Not consistent with national policy				

4: To which part of the Local	Paragraph	Policy	Policies	- 0
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	10: Signature	Stewart Patience		Date	3 rd Ju	ne 2019

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Part B	Your representation(s). Please fill in a separate sheet for each rep make	resentation you wish to
Part A: Pe	ersonal Details	
Q1: Are y appropria	ou making this representation as? (Please tic te)	k as
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b) Loc	al Authority or Town/Parish Council	
c) Lar	ndowner	
d) Age	ent / Consultant (on behalf of)	
e) Oth	er organisation (please specify which type of org	anisation below):
Water ar	nd sewerage company	
*If on a	egent is appointed please complete only the Title	Nome and Organization

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First name	Stewart	
Last name	Patience	
Job title (where relevant)	Spatial Planning Manager	
Organisation (where relevant)	Anglian Water Services Ltd	
Address line 1	Thorpe Wood House	
Line 2	Thorpe Wood	
Line 3		
City / Town	Peterborough	
County		
Postcode	PE3 6WT	

Telephone number	
Email (if provided we will always contact you this way)	

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2: Do you consider the	Yes	/ N	10	
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Not positively prepared				
Not justified			✓	
Not effective			✓	
Not consistent with national policy				
4: To which part of the Local		Policy		Policies
Plan does this representation		Policy number		Policies Maps

4 (1): 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 as drafted states development proposals should comply with the requirements of Guidance and Standards for surface water produced by Northamptonshire County Council as Lead Local Flood Authority. However the policy does not make reference to relevant documents produced by Anglian Water as sewerage undertaker for the Northampton Borough Administrative area relating to surface water management.

We would ask that developers are also asked that to follow the requirements of Anglian Water's Surface Water Policy, SuDs Adoption Handbook and Sewers for Adoption Version 8 or successor documents.

This is particularly important where SuDs features are proposed to adopted by Anglian Water or it is proposed that surface water is to be discharged to a public sewerage network. (We would only accept a surface water connection to the public sewerage network in exceptional circumstances where it can be demonstrated that there are no feasible alternatives.)

It is therefore suggested that the first paragraph of Policy 6 be amended as follows:

'and proposals which comply with relevant guidance for flood risk management and standards for surface water **produced by the LLFA and Anglian Water (or successor documents)** will be supported'

'96. In addition, NCC has published Local Standards and Guidance for Surface Water Drainage in Northamptonshire11. The guide is a living document, which is updated regularly with new emerging information. The guide is designed to assist developers in the design of surface water drainage system and to support local planning authorities in considering drainage proposal for new developments.

97. Anglian Water as sewerage company for the area has also produced surface water management guidance in relation to the evidence that applicants will be required to provide to demonstrate compliance with the surface water hierarchy. With Anglian Water's SuDs Adoption handbook setting out the circumstances in which SuDS features would be adopted by Anglian Water.'

We note that Policy 6 states that new development proposals should provide and maintain access for water supply and drainage infrastructure which is fully supported. It is important that the location of existing water and water recycling infrastructure (where relevant) is fully considered as part of the planning application process to ensure that we can continue to maintain existing infrastructure for our customers.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested changes, as there will not normally be a subsequent opportunity

to make further representations based on the original representation at publication stage.

SUSTAINABILITY APPRAISAL

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When the report of any person appointed to carry out an independent examination of Northampton Local Plan Part 2 is published	48
When the Northampton Local Plan Part 2 has been adopted	1

10: Signature	Stewart Patience	Date	3 rd June 2019

Other (please specify)

Thank you for taking the time to complete the form.

Please return it to:

Email:

By **post** or by **hand** to:

Northampton Borough Council

Planning Policy, The Guildhall, St Giles Square, Northampton, NN1 1DE



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e) Oth	er organisation (please specify which type of org	anisation below):
Water ar	nd sewerage company	
*If on a	egent is appointed please complete only the Title	Nome and Organization

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First name	Stewart	
Last name	Patience	
Job title (where relevant)	Spatial Planning Manager	
Organisation (where relevant)	Anglian Water Services Ltd	
Address line 1	Thorpe Wood House	
Line 2	Thorpe Wood	
Line 3		
City / Town	Peterborough	
County		
Postcode	PE3 6WT	

Telephone number	
Email (if provided we will always contact you this way)	

Part B: Representation(s)

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8: 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))			

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Other (please specify)	2,

10: Signature	Stewart Patience	Date	3 rd June 2019

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Email: planting the state of th

By **post** or by **hand** to: Northampton Borough Council



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Water ar	nd sewerage company	
*If on a	egent is appointed please complete only the Title	Nome and Organization

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First name	Stewart	
Last name	Patience	
Job title (where relevant)	Spatial Planning Manager	
Organisation (where relevant)	Anglian Water Services Ltd	
Address line 1	Thorpe Wood House	
Line 2	Thorpe Wood	
Line 3		
City / Town	Peterborough	
County		
Postcode	PE3 6WT	

Telephone number		
Email (if provided we will always contact you this way)		

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Water ar	nd sewerage company	
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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First name	Stewart	
Last name	Patience	
Job title (where relevant)	Spatial Planning Manager	
Organisation (where relevant)	Anglian Water Services Ltd	
Address line 1	Thorpe Wood House	
Line 2	Thorpe Wood	
Line 3		
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Postcode	PE3 6WT	

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10: Signature	Stewart Pat	ience	Date	3 rd June	2019

Email:



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10: Signature	Stewart Pat	ience	Date	3 rd June	2019

Email:



Northampton Borough Council is preparing a Local Plan Part 2 for the Borough which will supplement the West Northamptonshire Joint Core Strategy and will replace Saved Policies in the Northampton Borough Council Local Plan (1997). The Local Plan Part 2 will cover the period to 2029. This stage is the Proposed Submission Draft Local Plan Part 2 (Regulation 19) and is the version of the plan that the Council intends to submit to the Planning Inspectorate for independent examination.

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b) Loc	al Authority or Town/Parish Council	
c) Lar	ndowner	
d) Age	ent / Consultant (on behalf of)	
e) Oth	er organisation (please specify which type of org	anisation below):
Water ar	nd sewerage company	
*If on a	egent is appointed please complete only the Title	Nome and Organization

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First name	Stewart	
Last name	Patience	
Job title (where relevant)	Spatial Planning Manager	
Organisation (where relevant)	Anglian Water Services Ltd	
Address line 1	Thorpe Wood House	
Line 2	Thorpe Wood	
Line 3		
City / Town	Peterborough	
County		
Postcode	PE3 6WT	

Telephone number		
Email (if provided we will always contact you this way)	ò	

Please use a separate sheet for each representation

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10: Signature	Stewart Patience		Date	3 rd June	2019

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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First name	Stewart	
Last name	Patience	
Job title (where relevant)	Spatial Planning Manager	
Organisation (where relevant)	Anglian Water Services Ltd	
Address line 1	Thorpe Wood House	
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Last name	Patience	
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