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Page 2: Fair Processing Notice issued under The Data Protection Act 1998

Q1 Please provide your contact details in the boxes below:

Name (required)	John O'Neill
Position (if appropriate)	Planning Specialist
Company (if appropriate)	Environment Agency
Address 1 (required)	Nene House
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Town	Kettering
Postcode (required)	NN15 6JQ
Email Address	
Phone Number	

Q2 Are you are an agent responding on behalf of another? **No**

Q3 If you are an agent responding on behalf of another, please enter your details below: **Respondent skipped this question**

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Q4 Which sites that have been assessed as being suitable for further consideration (Appendix A) do you think are most appropriate for development?Please state site number(s) – e.g. LAA0999 - and tell us why you think each site is most appropriate **Respondent skipped this question**

Q5 Which sites that have been assessed as being suitable for further consideration (Appendix A) do you think are least appropriate for development?Please state site number(s) – e.g. LAA0999 - and tell us why you think each site is least appropriate

Northampton Local Plan (Part 2) Sites Consultation

Sequential Test

Your Authority should now demonstrate through evidence that it has considered a range of options in the site allocation process, using the Strategic Flood Risk Assessment to apply the Sequential Test and the Exception Test where necessary. Where other sustainability criteria outweigh flood risk issues, the decision making process should be transparent with reasoned justifications for any decision to allocate land in areas at high flood risk in the sustainability appraisal report. The Sequential Test can also be demonstrated in a free-standing document, or as part of strategic housing land or employment land availability assessments.

Flood Zone 3 and/or 2

LAA0167 Tanner Street
LAA0176 Sixfields (EP)
LAA0177 Sixfields (PCT)
LAA0180 St James Road (former Bus Depot)
LAA0278 National Tyre/Oddbins Abington, St Peters Way
LAA0288 Railway Station Car Park
LAA0615 Crow Lane North
LAA0665 190 - 199 St Andrews Road
LAA1025 Land to the west of Towcester Road
LAA1096 Land off Mill Lane (see LAA0172)
LAA1107 Former Abington Hill Farm, land off Rushmere Road
LAA1134 St Johns Railway Embankment
LAA1005 Land north of Martins Yard, Spencer Bridge
LAA1007 Land south of Wooldale Road, east of Wootton Road
LAA0208 Swan Valley Gateway

Flood Zone 3b

The following sites may be located within functional floodplain (Flood Zone 3b):

LAA0176 Sixfields (EP)
LAA0278 National Tyre/Oddbins Abington, St Peters Way
LAA0665 190 - 199 St Andrews Road
LAA1025 Land to the west of Towcester Road
LAA1107 Former Abington Hill Farm, land off Rushmere Road
LAA1005 Land north of Martins Yard, Spencer Bridge
LAA1007 Land south of Wooldale Road, east of Wootton Road
LAA0208 Swan Valley Gateway

The flood risk vulnerability of the development type are not compatible with Flood Zone 3b and should not therefore be permitted.

A refresh of the SFRA is required to provide the most up to date assessment of flood risk for the application site, in particular the Hazard Maps should be considered. This will need to be made in full knowledge of the future plans for management or maintenance of the flood defences and drainage infrastructure, together with knowledge of how climate change will affect the protection offered over the lifetime of the development.

We recommend that sites keep built development out of flood zones 2 and 3 and consider such zones for water compatible uses, such as green infrastructure.

Wastewater infrastructure

We cannot support the progression of the Local Plan part 2, on the grounds of soundness, unless it is fully supported, informed by, and takes full account of the risks set out in, up to date Water Cycle Strategies. The current WCS is considered out of date for these sites that have been assessed as being suitable for further consideration.

As previously agreed Anglian Water will do a RAG assessment of any sites which are proposed to be allocated to inform whether further water cycle work is necessary to support these sites. We would request sight of their assessment and the opportunity to comment ahead of any decision regarding whether further water cycle work is necessary.

Q6 Which sites do you think should be protected from development? Please state site number(s) – e.g. LAA0999 and tell us why you think each site should be protected from development

We agree that there is an opportunity to build on Policy BN7: Flood Risk through more specific development management policies and site allocations that are selected following consideration of their risk of flooding particularly in those areas of the Borough that are the most vulnerable to flooding areas, such as St James and Far Cotton. The Local Plan (Part 2) may also offer opportunities to encourage flood management through the green/blue infrastructure network and sustainable drainage systems including the following sites:

Main River

LAA0278 National Tyre/Oddbins Abington, St Peters Way

LAA0665 190 - 199 St Andrews Road

LAA1025 Land to the west of Towcester Road

LAA1005 Land north of Martins Yard, Spencer Bridge

LAA1007 Land south of Wooldale Road, east of Wootton Road

LAA0208 Swan Valley Gateway

Again, an SFRA refresh should consider if any sites present opportunities to encourage flood management.

Q7 Are there any sites that have been assessed as not being suitable for further consideration (Appendix B) that should be? Please state site number(s) – e.g. LAA0999 - and tell us why you think each site is suitable for further consideration

If any sites currently not considered suitable for further consideration are reassessed as being suitable we would request to be informed in order to provide site specific advice.

Q8 Are there any sites which you think should be used for other purposes? Please state site number(s) – e.g. LAA0999 - and the best use for the site, e.g.: Residential Employment Retail Community facilities Open or green space Waste Other (please specify)

Green Infrastructure

We recommend that sites keep built development out of flood zones 2 and 3 and consider such zones for water compatible uses, such as green infrastructure.

Where any sites have already been identified through NBCs Green Infrastructure Plan we would support their use for GI. We consider that the following sites present opportunities for delivering GI and WFD improvements:

LAA0278 National Tyre/Oddbins Abington, St Peters Way

LAA0665 190 - 199 St Andrews Road

LAA1025 Land to the west of Towcester Road

LAA1005 Land north of Martins Yard, Spencer Bridge

LAA1007 Land south of Wooldale Road, east of Wootton Road

LAA0208 Swan Valley Gateway

Again, an SFRA refresh should consider if any sites present opportunities to encourage flood management.

Q9 Are there any other sites you think are suitable for the Council to consider in preparing the Local Plan Part 2? Please give further details, and submit details by email using the Call for Sites form available on the Council's website

Respondent skipped this question

Page 4: Sustainability Appraisal of Site Options & Habitats Regulations Assessment

Q10 Do you have any comments on the Sustainability Appraisal of Site Options?

Respondent skipped this question

Q11 Do you have any comments on the information to support the Habitats Regulations Assessment?

Respondent skipped this question

Page 5: Equality and Diversity

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