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**Our ref:** AN/2012/114000/SL-01/SB4-L01

**Your ref:**

**Date:** 07 April 2021

Dear Paul

### **Northampton Local Plan Part 2 Submission**

Thank you for your email dated 29 March 2021 regarding the exception test for the allocated sites within the Local Plan Part 2 submission for Northampton.

In accordance with national guidance the Council has used the Sequential Test and where necessary the Exception Test to inform the allocation of land in its Local Plan either as a site with an associated policy regarding the flood risk attributed to them or site specific allocations outlining the additional information that is required.

As the Sequential Test has not been met for some of these sites, it will be necessary for those sites to meet the requirements of the Exception Test.

The National Planning Policy Framework states that if following the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied in certain circumstances.

For the Exception Test to be passed, two criteria must be satisfied:

- a. it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, and
- b. a site-specific Flood Risk Assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. (depending on the flood risk the size of development may be constrained)

Further compliance with part b of the test, it will need to be demonstrated by developers by reference to site specific flood risk assessments (The WNJCS Policy BN7 includes a policy requirement to this effect. The Strategic Flood Risk Assessment (SFRA) Level 1 and 2 assessment provides some principles as to

mitigation and alleviation measures that could be applied at development sites at risk of flooding.

After a further review of the of the Northampton Local Plan Part 2 2011-2029 Submission Version December 2020 and the Flood Risk sequential test and exceptions test report dated December 2018, further explanation would be required for site allocation:

**LAA1099 Upton Park (Upton Reserve Site)** as the entire site is within flood zone (FZ) 3b, as part of Upton Flood Attenuation Area. A site specific Flood Risk Assessment would not be able to remove the site from FZ3b, therefore part b of the exception test would not be passed.

Please let me know if I can be of further assistance with any additional queries that may be raised prior to the examination.

Yours sincerely

**Kerrie Ginns**  
**Sustainable Places - Planning Specialist**

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