Dear Sir/Madam,

Thank you for the opportunity to comment on the Northampton Local Plan Part 2 Issues Paper and related documents. Please find enclosed a response on behalf of Anglian Water. I would be grateful if you could confirm that you have received this response.

**Northampton Local Plan Part 2 Issues Paper**

**Question 6 – Is there evidence to support the Local Plan (Part 2) introducing the optional national housing technical standards in relation to water efficiency standards?**

National Planning Practice Guidance enables local planning authorities to set out the optional water efficiency requirement in a Local Plan where it can be demonstrated that there is a clear need. In doing so reference should be made to the Environment Agency’s water stressed area classification maps and Anglian Water’s Water Resource Management Plan.

Our understanding is that the Environment Agency (EA) considers that Northampton Borough is located in a water stressed area as defined in the EA’s maps. Therefore we would support the principle of the optional water efficiency standard being applied within Borough Council. However the Borough Council will need to consider further the impact that such a requirement would have on the overall financial viability of the Local Plan.

**Question 10 – Please provide details of any particular infrastructure issues in relation to new development which you think the Local Plan (Part 2) should address, if possible providing evidence.**

The Local Plan Part 2 will include specific allocation sites in addition those previously identified in the adopted West Northamptonshire Core Strategy. It is recommended that the Borough Council consider the capacity of existing water and water recycling infrastructure to accommodate these allocation sites including the need for improvements where appropriate. Please also see the comments set out below relating to the SA Scoping Report and land availability methodology.

**Question 19 – Is there a need for the Local Plan (Part 2) to include a locally specific policy to promote measures within new development to address climate change and renewable energy in addition to the policies in the Joint Core Strategy?**

We note that the West Northamptonshire Core Strategy already includes a borough wide policy which includes reference to sustainable drainage systems.

It is not considered necessary to duplicate the requirements of Policy BN7A in the Part 2 Local Plan in relation to surface water management. However it would be
helpful to consider whether there any specific development criteria for the proposed allocation sites (once identified) which are needed relating to water and water recycling infrastructure.

Central Area Action Plan

Question 22 Flood Risk and Drainage (Policy 5) - is this policy still appropriate and up to date in relation to the Drainage Plan Part 1?

We would suggest that consideration should be given to including an additional policy to take account of the findings of the Drainage Plan (once finalised) for the Central area.

Sustainability Appraisal Scoping Report

Question 32 - Do you have any comments on the Sustainability Appraisal Scoping Report?

Reference is made to building on policies in the adopted Core Strategy and the Borough Council consider the phasing of development in relation waste water treatment capacity.

It would be helpful if this issue was considered further by the Borough Council as part of the Part 2 Local Plan. We would welcome further discussions with the Borough Council and the Environment Agency relating to any additional evidence which is required to support the preparation of the Local Plan Part 2.

Land Availability Assessment Methodology (LAAM)

Do you have any comments on the proposed Methodology for the Northampton Land Availability Assessment?

Reference is made to 'critical infrastructure' but there is no further explanation of what is meant by this term. Anglian Water is able to provide comments to the Borough Council relating to the capacity of water and water recycling assets and asset encroachment which could be used to inform the preparation of the Land Availability Assessment.

Reference is made to potential environmental/amenity impacts for sites which are adjacent to sewage treatment works.

Anglian Water assess the risk of developments which are located within 400m of existing water recycling centres (formerly sewage treatment works). Therefore it is considered that the methodology should consider the potential risk of odour for any proposed allocation sites which are located within 400m of a water recycling centre.

Anglian Water’s Asset Encroachment Methodology is available to view at the following address:

http://www.anglianwater.co.uk/developers/encroachment.aspx

Similarly we consider that development located within 15m of the pumping station would place them at risk of nuisance in the form of noise, odour or the general disruption from maintenance work caused by the normal operation of the pumping station. Therefore it is considered that the methodology should consider the potential risk of amenity impacts from pumping stations where relevant.
Should you have any queries relating to this response please let me know.

Regards,

Stewart Patience
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