Please find attached a copy of our response to this consultation.

We look forward to working with you on an update to the Water Cycle Study and Strategic Flood Risk Assessment as well as a water efficiency standards policy.

Kind regards,

John
John O'Neill
Planning Specialist

Environment Agency | Sustainable Places | Lincolnshire and Northamptonshire Area
Nene House, Pylchley Lodge Road, Kettering, NN16 6JQ.

www.gov.uk/environment-agency

cid:image003.png@01CF4CFA.B611ECACD

From: Planning Policy [mailto:]
Sent: 19 September 2016 13:35
To: Planning Kettering >
Subject: Northampton Local Plan (Part 2) Options Consultation

Dear Mr O'Neill,

Consultation on the Northampton Local Plan (Part 2) Options Documents:
21 September – 02 November 2016

The Plan is the long term strategy for what, where, when and how development will be managed in the Borough. The Northampton Local Plan (Part 2) will provide detailed planning policies and will identify areas for development as well as areas that should be protected from development. Once adopted, it will form part of the Development Plan for Northampton.

Once adopted, the new Local Plan will also incorporate those policies from the Central Area Action Plan that are still up to date or which are updated through the plan preparation process.

The consultation is an opportunity for you to comment on the Council’s proposed strategy for planning positively for new homes and jobs, whilst protecting and enhancing the natural and historic assets within the Borough. The consultation paper sets out a vision for Northampton for 2029, the objectives which the Local Plan (Part 2) will be seeking to achieve and the strategy that will underpin future development and regeneration activity across the Borough. A Frequently Asked Questions has also been prepared to provide more information about the Local Plan and why we are preparing it.

We are also inviting comments on the Sustainability Appraisal Options Report which considers the likely significant effects that the Northampton Local Plan (Part 2) may have on various environmental, economic and social factors.

The consultation documents are now subject to public consultation for a six-week period from 21 September to 02 November 2016 at 6.00pm.

The consultation documents are available on the Council’s website at: http://northampton.gov.uk/localplan

The documents are also available for inspection during the consultation period at the following venues during normal opening hours:

The Guildhall One Stop Shop, Northampton Borough Council
Abington Library
Duston Library
Far Cotton Library
Hunsbury Library
Kingshorpe Library
Central Library
Copies of the consultation documents will also be available to view at these locations:

- **Duston Community Centre**
  Pendle Road, Duston, Northampton NN5 6DT
  Monday – Friday: 9.30am – 12.30pm

- **Wootton Community and Sports Centre,**
  Curtlee Hill, Wootton, Northampton NN4 6ED
  Monday – Friday: 10.00am – 3.00pm

In addition, officers from the Planning Policy Team will be available to answer questions about the consultation on Thursday 13 October between 12.00 and 5.00pm, in the One Stop Shop at The Guildhall.

**How to comment:**

An online questionnaire is available on the Council’s website at: [http://northampton.gov.uk/localplan](http://northampton.gov.uk/localplan). This is the Council’s preferred method for receiving representations.

You can also download a comments form from the website.

Copies of the comments form can be returned by post to:
Northampton Local Plan (Part 2) Options Consultation,
Planning Policy,
Regeneration, Enterprise & Planning Directorate,
Northampton Borough Council, The Guildhall, St. Giles Square, Northampton NN1 1DE

or electronically to: [planningpolicy@northampton.gov.uk](mailto:planningpolicy@northampton.gov.uk)

**Please note all comments must be received by 5.00pm on Wednesday 2 November 2016.**

If you no longer wish to be contacted regarding future Development Plan consultations or if you have any queries please contact the Planning Policy team using the contact details above.

Yours sincerely

Claire Berry
Planning Policy and Heritage Manager

Please note that the contents of this e-mail, including any attachments thereto, may contain information which is confidential or privileged, and which is solely for the use of the recipient named above. The information contained in this e-mail, and in your reply, may be subject to disclosure under the Freedom of Information Act 2000 or other legislation, and its confidentiality cannot be guaranteed. If you are not the intended recipient, please be aware that any disclosure, copying, distribution or use of the contents of this e-mail is strictly prohibited.
Consultation Guidance Notes

- Northampton Local Plan (Part 2) Options Consultation
- Sustainability Appraisal of the Options Consultation Paper

Northampton Borough Council is inviting your comments on the Northampton Local Plan (Part 2) Options consultation and the accompanying Sustainability Appraisal.

This follows the Scope and Issues consultation which was undertaken between April and June 2016. It focuses in more detail on some of the key issues in preparing the Northampton Local Plan (Part 2) and will form the second formal stage of the local plan preparation process.

The Options consultation paper sets out a vision for Northampton for 2029, the objectives which the Northampton Local Plan (Part 2) will be seeking to achieve and the strategy that will underpin future development and regeneration activity across the Borough. It sets out some of the key challenges that the new Local Plan (Part 2) will need to address, focusing on the delivery of growth, particularly the challenges of delivering new homes, economic prosperity and the future role of our centres, in a sustainable and deliverable way. The strategy sets out how the Council can plan positively for the new homes and jobs, whilst protecting and enhancing the natural and historic assets within the borough. The vision, objectives and strategy are informed by the West Northamptonshire Joint Core Strategy Local Plan (Part 1) and responses to the Northampton Local Plan (Part 2) Scope and Issues consultation.

The Central Area Action Plan (CAAP) 2013 contains development plan policies for Northampton town centre and its immediate surrounding area. Some policies have now been superseded by recent development and/or changes in legislation, such as recent changes affecting permitted development rights, and need updating. It is proposed that the new Local Plan (Part 2) will contain those CAAP policies which remain up to date and any CAAP policies which need updating. Once adopted, the new Northampton Local Plan (Part 2) will supersede the Central Area Action Plan.

The accompanying Sustainability Appraisal considers the likely significant effects that the Local Plan may have on various environmental, economic and social factors.

The consultation period runs from Wednesday 21 September to 5pm on the 02 November 2016.

Where can I view the consultation documents?

You can view the consultation documents in the following ways:

- On the Council’s consultation portal at http://northampton.gov.uk/localplan
  This system also allows you to submit comments.
- At the Guildhall One Stop Shop, Northampton Borough Council, St Giles Square, Northampton NN1 1DE
At all libraries in Northampton Borough

If you do not have access to a computer, you can request paper copies by:

telephoning 01604 837326

Or by writing to

Northampton Local Plan (Part 2) Options Consultation, Planning Policy, Regeneration, Enterprise & Planning Directorate, Northampton Borough Council, The Guildhall, St Giles Square, Northampton NN1 1DE

If you would like copies of consultation documents in translated or other formats please refer to the Council’s website at:

http://www.northampton.gov.uk/info/200041/equality_and_diversity/1309/interpreting

How can I comment?

You can comment on the consultation documents in one of the following ways:

Online: http://northampton.gov.uk/localplan OR

Complete the comments form which you can download from the website. By using the comments form, it helps us ensure we have all the correct information to register and process your comments and keep you informed. Once completed you can do the following:

Email: planningpolicy@northampton.gov.uk OR

Post: Northampton Local Plan (Part 2) Options Consultation, Planning Policy, Regeneration, Enterprise & Planning Directorate, Northampton Borough Council, The Guildhall, St Giles Square, Northampton NN1 1DE (using the comments form available on the website)

All the above can be found by accessing the following link:

http://northampton.gov.uk/localplan

Responses should be submitted by 5pm on Wednesday 02 November 2016.

Please note that comments submitted to the Issues Consultation do not need to be sent again.

How will my comments be used?

The Council will consider your comments in progressing work on the Northampton Local Plan (Part 2). Comments received will be published on the Council’s consultation portal in accordance with the Data Protection Act.
Responses will be reported to the Council’s Cabinet Advisory Group, which advises on the preparation of the Northampton Local Plan (Part 2). They will also be reported in summary to the Council’s Cabinet.

If you are organising a petition or intend to, or have signed one, it must be submitted by the deadline and be accompanied by the name and contact details of the petition organiser. The Council will only register the petition organiser on its Local Plan consultation database and future notifications will only be sent to the petition organiser. The number of signatories to the petition will be recorded.

Following the consultation, a feedback report will be produced setting out the main issues raised. Consultation responses will be used to inform preparation of the following:

- Draft Northampton Local Plan (Part 2)
- Sustainability Appraisal of the Draft Local Plan (Part 2)

**Fair Processing Notice issued under The Data Protection Act 1998**

All observations, objections and supporting comments submitted to Northampton Borough Council are public documents. Therefore the information you submit in response to consultations on the Local Plan will be publicly available as part of the consultation responses and made available for any member of the public to view in person. This may include your name and the comment made. Specific personal contact data such as your email address, signature, postal address and telephone number will not be published on the Northampton Borough Council website but retained for contact purposes only by the planning department at Northampton Borough Council.

In submitting a comment on the Local Plan you agree for your information to be held and processed for the purpose(s) and in the way detailed above.

If you have any questions, please contact us by email at: planningpolicy@northampton.gov.uk or by telephone: 01604 837326.
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<th>Your Contact Details</th>
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<tr>
<td><strong>Your Details</strong></td>
<td><strong>Agents Details (if applicable)</strong></td>
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<tr>
<td>Name</td>
<td>John O'Neill</td>
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<td>Organisation</td>
<td>Environment Agency</td>
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<td>Position</td>
<td>Planning Specialist</td>
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<td>Email</td>
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<td>Your Role</td>
<td>Are you the Landowner, Land Agent, Developer, Housing Association, Planning Consultant, Other?</td>
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**Statutory consultee - advisor**
Northampton Local Plan (Part 2)
Consultation on the Options Paper

Question 1 – Do you have any comments on the vision for the Northampton Local Plan (Part 2)?

Question 2 – Do you think there are other objectives that should be included?

Objective 10 - Climate Change should also refer to ‘securing tighter water efficiency requirements’ which would align with the National Planning Practice Guidance which 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.
Question 3 - Do you agree that we should apply a 20% housing land supply buffer to our housing land supply?

Question 4 – Do you agree with a residential density of 40 dwellings per hectare outside of the sustainable urban extensions, with higher densities in the town centre, other centres and along key transport corridors?
Question 5 – In allocating sites for housing development, do you agree that we should give priority to sites that can be delivered in the short term?

Question 6 – What other actions would help new homes to be built and completed more quickly on the identified sites for housing development?
Question 7 – Do you agree that we should identify sites for specialist housing?

Question 8 – Do you agree that we should identify sites specifically for the provision of older persons housing?
Question 9 – Should allocations for general housing include a proportion of smaller market dwellings (1 and 2 bed)?

Question 10 – Should the plan specify a threshold or proportion of serviced plots to ensure the delivery of custom-build and self-build plots?
Question 11 – Do you agree that there is demand for more small scale office space, especially in the town centre?

Question 12 – Do you think that dated, low value office stock in the town centre is oversupplied?
Question 13 – Do you agree that outside the town centre, some medium and larger office allocations should be released to provide small or medium sized industrial and distribution uses to help meet demand for these uses?

Question 14 – In demonstrating that existing employment sites have been actively marketed before they are considered for release to other uses, should active marketing be required to be undertaken for a minimum period of 12 months or 24 months?
Question 15 – Do you agree that we should allow more flexibility in some smaller centres for other uses to be introduced?

Question 16 – Do you agree that we should review the secondary retail frontages policy, which restricts non-retail uses in some sections of frontage, to allow greater flexibility for non-retail uses in some areas?
Question 17 – Do you think that within the town centre, some of the medium and larger sized office allocations are oversupplied?

Question 18 – Are there any other Development Management policies that you think should be included in the Northampton Local Plan (Part 2)?

There are several development management policies with links to the water environment. We note Design Principles, Landscape, Green Infrastructure and Open Spaces, Biodiversity and Trees and Flood Risk and Surface Water Drainage. Perhaps there could be scope for a policy on river ecosystem protection, preservation and restoration with links to the other mentioned policies?

All of these have links with increasing biodiversity and improving habitats, achieving cleaner water used in a more sustainable way and increase the number of people enjoying the natural environment. However, because of the multiple objectives/policies there is a risk that to ensure that development does not damage river ecosystems, and contributes to river restoration, does not materialise as the objectives identify fragments of it rather than making a design principle of it.

Further consideration should also be given to specific water efficiency standards. Rather than developments having to demonstrate ‘how efforts have been made to maximise the efficient use of water, including water storage and harvesting wherever practical,’ the policy should include a specific water efficiency standard for new developments. This would align with the National Planning Practice Guidance which 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. Please refer to our response to the issues paper on this matter.

New dwellings shall include water efficiency measures to comply with a limit of X litres per person per day, or better. This limit for the provision of water efficiency will apply to conversions or redevelopment of buildings, whether or not they are already in residential use.

A similar approach should be considered for non-residential developments.

As the Plan progresses we expect that the Plan and this policy including the supporting text will be updated to reflect the outcomes of the refresh to the Water Cycle Study and Strategic Flood Risk Assessment. We cannot support the progression of the Local Plan to the submission stage, 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 Strategic Flood Risk Assessments and Water Cycle Strategies.
When preparing a Local Plan, the Council is legally required to undertake an environmental appraisal of its proposed plans and policies, as well as a Strategic Environmental Assessment (SEA). There is a requirement to consider the social, economic and environmental impacts of the policies in the Local Plan.

**Question 19 - Do you have any comments on the Sustainability Appraisal of the Options Consultation Paper?**

Please identify the page, paragraph number(s), table or appendix within the Sustainability Appraisal to which each of your comments applies.

A section could be included in the Suitability Appraisal that refers to land contamination and groundwater protection to ensure that risk potential posed to controlled waters is assessed on a site by site basis:

Where development is proposed on a site which is known or has the potential to be affected by contamination, a preliminary risk assessment should be undertaken by the developer as the first stage in assessing the risk.

Developers should follow the risk management framework provided in CLR11 'Model Procedures for the Management of Land Contamination', when dealing with land affected by contamination.

Guidance document GP3 Groundwater Protection: Principles and Practice is a useful reference for ensuring groundwater is protected during development. It describes how to manage and protect groundwater in the most sensitive locations.

This may help achieve Sustainability Objectives 4, 9 and 13 as described in the Scoping Report.

Water efficiency standards could be used for policy indicators.