Dear Julia

Thank you for consulting Northamptonshire County Council as the Lead Local Flood Authority (incorporating surface water drainage team) on the Broughton Neighbourhood Development Plan.

Neighbourhood Planning allows communities to have a greater say over the development that takes place in their area, and thus enables fuller consideration of the environmental risks future development may pose to the community. On review of the plan we are concerned that flood prevention and alleviation measures have not been considered.

Considering the risk associated of flooding in the area, policy measures which specifically target flood risk should be considered in the plan. For example we would always encourage that any future developments incorporates use of Sustainable urban Drainage Systems (SuDS), and our data, which has been acquired from BGS, demonstrates that a significant proportion of the parish is potentially suitable for bespoke infiltration SuDS.

More information is provided in the Local Standards and Guidance for Surface Water Drainage, which can be found here: [https://www.floodtoolkit.com/planning/](https://www.floodtoolkit.com/planning/)

The Broughton Neighbourhood Plan could also be a mechanism through which development is steered away from the ordinary watercourse located within the parish. We feel that it would be pertinent for any Neighbourhood Plan coming forward to signpost to the consents required to undertake works on or in close proximity to watercourses. Land Drainage Consent is required to undertake works on or within 9m of ordinary watercourses (any watercourse that conveys water that is not a main river). Further bespoke guidance for the consideration of flood risk and Neighbourhood Planning which may be of use and can be found here: [http://www.floodtoolkit.com/guides/22-neighbourhood-planning-flood-risk/](http://www.floodtoolkit.com/guides/22-neighbourhood-planning-flood-risk/)

It is advised that policies are established to ensure that development proposals adequately account for the risk of groundwater flooding, incorporating mitigation measures wherever possible. Our information indicates that areas of the Parish are at very low risk from groundwater flooding. Our ‘Groundwater Flood Guide’ contains further information on the measures which can be taken to mitigate the risks of groundwater flooding, and is available here: [https://www.floodtoolkit.com/wp-content/uploads/2017/05/10.Groundwater.pdf](https://www.floodtoolkit.com/wp-content/uploads/2017/05/10.Groundwater.pdf)

Although flood risk to the village is low the neighbourhood plan does not make specific reference to existing areas that currently flood or are at risk of flooding, it would be good to see some reference to addressing this flood risk in the Neighbourhood Plan. There is a vast amount of advice and guidance on the Flood Toolkit ([www.floodtoolkit.com](http://www.floodtoolkit.com)) to help support this process as well as in the reports provided.

Please do not hesitate to contact us should you have any questions,
Dear Sir or Madam,

**RE: BOUGHTON NEIGHBOURHOOD PLAN AND NEIGHBOURHOOD DEVELOPMENT ORDER – REGULATION 16 AND 23 CONSULTATION**

I am writing to inform you that from **Wednesday 18th October 2017** to **Wednesday 29th November 2017** Kettering Borough Council will be consulting on the proposed Broughton Neighbourhood Plan and proposed Broughton Neighbourhood Development Order.

The Broughton Neighbourhood Plan and Broughton Neighbourhood Development Order were submitted to the Council on the 29th September 2017. In accordance with regulations 16 and 23 of the Neighbourhood Planning (General) Regulations 2012 (as amended), the plan and order proposals are now available for comment.

Please find attached a copy of the Representation Procedure which provides further details of how to comment. Copies of the plan and order proposals are available to view on the Kettering Borough Council website [www.kettering.gov.uk/neighbourhoodplans](http://www.kettering.gov.uk/neighbourhoodplans).

Comments should be sent by e-mail to [planningpolicy@kettering.gov.uk](mailto:planningpolicy@kettering.gov.uk) or in writing to Development Services, Kettering Borough Council, Municipal Offices, Bowling Green Road, Kettering by **5pm on 29th November 2017**.

If you require any further information please do not hesitate to contact myself or another member of the Planning Policy Team on 01536 534316.

Yours faithfully

Julia Baish