Comments

Site Specific Part 2 Local Plan - Publication Plan Consultation (18/12/19 to 12/02/20)

Comment ID 14
Response Date 28/01/20 12:35
Consultation Point Flood Risk and Sustainable Water Management (View)
Status Processed
Submission Type Email
Version 0.3

Representation

Please use a separate form for each representation.

Which part of the Publication Plan does your representation relate to?
Flood Risk and Sustainable Water Management

Tests of Soundness

Do you consider the Local Plan is sound in terms of being:

Justified
Effective
Positively prepared
Consistent with National Policy

Reasons

Please give the reason(s) why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the statutory Duty to Cooperate.

There seems to be an issue with the consultation portal as an error code is displayed. Please see below the LLFA's response to the Site Specific Part 2 Local Plan – Publication Plan Consultation.

1) Section 8 Flood Risk and Sustainable Water Management

8.3 states ‘JCS Policy 5 states development should contribute to reducing the risk of flooding and development should incorporate sustainable drainage systems where practicable.’

However
NPPF (2019) para 163 ‘Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location

b) the development is appropriately flood resistant and resilient

c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;’

It is our opinion that the NPPF is a base line requirement and so the Site Specific Part 2 Local Plan should adopt the wording as highlighted above.

2) 8.9 ‘Major new developments must address surface water drainage requirements as set out in the Northamptonshire Flood Toolkit and local guidance’

Change to

‘All Major developments must address surface water drainage requirements as set out in the Northamptonshire Flood Toolkit and local guidance’

Notifications

Do you wish to be notified?