

FAO: Samuel Dix
South Northamptonshire Council
Development Control
The Forum Moat Lane
Towcester
NN12 6AD

Our ref: AN/2020/130547/01-L01
Your ref: S/2020/0930/MAO
Date: 01 July 2020

Dear Samuel

**Outline Planning Application for up to 35 (maximum) residential dwellings including access with all other Matters Reserved
Land South of Station Road Blisworth Northamptonshire NN7 3DN**

Thank you for consulting us on the above application, on 11 July 2020.

Environment Agency position

In the absence of an acceptable flood risk assessment (FRA) we **object** to this application and recommend that planning permission is refused.

Reason

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, it fails to:

- consider how people will be kept safe from the flood hazards of a breach of the canal
- consider how a range of flooding events (including extreme events) will affect people and property
- include an assessment of the impact of climate change using appropriate climate change allowances.

Information for applicant

Canal breach

Due to the proximity of the site to the canal we would expect breach analysis of the canal to be carried out in accordance with FD2320/TR2 "Flood Risk Assessment Guidance for New Development Phase 2". The site is on the other side of the ordinary watercourse to the canal and it does slope up to Northampton Road, but the culverts downstream could restrict flow so the valley could start to fill in a canal breach.

Modelled flood information

The flood zones for your site have been produced based on national scale generalised

Environment Agency

Nene House (Pychley Lodge Industrial Estate),
Pychley Lodge Road, Kettering, Northants, NN15 6JQ
Email: LNplanning@environment-agency.gov.uk
www.gov.uk/environment-agency

Customer services line: 03708 506 506

Calls to 03 numbers cost the same as calls to standard geographic numbers (i.e. numbers beginning with 01 or 02).

Cont/d..

modelling and not from local scale detailed modelling. The national scale generalised modelling covers all watercourses with a catchment greater than 3km². It also includes dry valleys so the flood map may show a flood extent where there is no watercourse. The Environment Agency do not hold any modelled flood levels or flows for this watercourse.

Northampton and upstream design standard

Following the significant flooding to Northampton town centre in Easter 1998 improvements were made to the defences along the River Nene. In order to secure the level of protection afforded by the new defence we have agreed with the West Northants Joint Planning Unit that the standards set for new development should also be improved, beyond industry standards.

Therefore all new development in the Upper Nene catchment will be designed for a flood with a 0.5% probability(1 in 200 chance) occurring in any year, including an appropriate allowance for climate change. This includes design of mitigation for main river flooding and any surface water attenuation. This applies across the whole of the Upper Nene catchment including all branches and arms of the Nene, upstream of Billing Aquadrome, and all tributaries such as Wootton Brook, Dallington Brook and Bugbrooke Brook.

This is supported by a document we produced “Strategic Review of development and flood risk, Nene catchment Northampton and upstream” (hard copy can be supplied if required) and reinforced more recently in the West Northamptonshire Strategic Flood Risk Assessment (SFRA) Part 1 update (December 2017)
<https://www.northampton.gov.uk/download/downloads/id/10112/west-northamptonshire-level-1-sfra-update---final.pdf>

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations. Should our objection be removed, it is likely we will recommend the inclusion of a condition on any subsequent approval.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

Keri Monger
Sustainable Places - Planning Adviser

Direct dial 020 847 48545

Direct e-mail keri.monger@environment-agency.gov.uk