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Great Addington Neighbourhood Plan – Regulation 16 Submission

I refer to your consultation dated 11 December 2024 in relation to the Regulation 16 Submission for Great Addington Neighbourhood Plan (the Plan).

We aim to reduce flood risk, while protecting and enhancing the water environment. Our comments on this matter are therefore made solely from these points of view.

Environment Agency position

We note we should be specifically commenting on whether the submitted Plan meets the basic Conditions before it goes to Examination. Furthermore, we note that the basic Conditions are that the Plan;

- Must be appropriate having regard to National Policy
- Must contribute to the achievement of sustainable development
- Must be in general conformity with the strategic policies in the development plan for the local area
- Must be compatible with human rights requirements; and
- Must be compatible with EU obligations.

From the point of view of the topics the Environment Agency is able to comment on, as outlined above, we consider that the Plan will generally meet the basic Conditions.

However, we would recommend any comments made in the following sections are addressed when it is considered at the Examination.

Some of these views were made on 01 July 2024 when we were consulted on the Pre-submission draft of the Plan.

1. Flood risk

We note that, in response to previous comments we have made, you have added wording to paragraph 5.33 which says 'Map 7 shows the most recent flood risk map for the area. This flood mapping information is currently being updated and due to be published later in 2024/25'. We have no further comments to make on this topic.

2. Groundwater and contaminated land

We note that paragraph 2.2 of the Plan has been amended to make a general reference to the aquifers that lie over Great Addington in response to previous comments we have made. Whilst we welcome this, we recommend that the following, more detailed information, from our previous comments, is considered within Section 2 (Profile) of the Plan itself:

The Great Addington Neighbourhood Plan area mainly lies over geology classified as principal and secondary A aquifers. The principal aquifers can support water supply and river base flow on a strategic scale, whereas secondary A aquifer can support local abstractions and baseflow to streams and rivers. The use (or potential use) of groundwater in the area makes parts of the area vulnerable to pollution from certain types of development. Best practice to ensure groundwater is protected from pollution and as a resource is contained within guidance document 'The Environment Agency's approach to groundwater protection' available at [Groundwater protection position statements](https://www.gov.uk/government/publications/groundwater-protection-position-statements) - GOV.UK (www.gov.uk). This publication sets out our position for a wide range of activities and developments, including:

- Waste management
- Discharge of liquid effluents
- Land contamination
- Ground source heat pumps
- Cemetery developments
- Drainage

We also wish to reiterate the following from our previous comments for the information of interested parties:

Land affected by contamination may pose risk to human health, groundwater, surface waters and the wider environment. We recommend that developers should:

- Follow the risk management framework provided in [Land Contamination: Risk Management](#), when dealing with land affected by contamination
- Refer to our [Guiding principles for land contamination](#) for the type of information that we require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health
- Consider using the [National Quality Mark Scheme for Land Contamination Management](#) which involves the use of competent persons to ensure that land contamination risks are appropriately managed
- Refer to the [contaminated land](#) pages on gov.uk for more information

Finally, our previous comments recommended reference to a historic landfill within the area covered by the Plan (Home Farm - active until 1984 with inert waste deposited). We should be grateful if this could be considered for identification in the Neighbourhood Plan so any risk posed can be appropriately managed.

3. Water quality, foul drainage and water efficiency

We welcome the reference on agreeing foul drainage in consultation with relevant bodies in Policy GA17, relating to Land North of Cranford Road, Great Addington.

We note that, further to our previous advice, Anglian Water has been consulted on the Plan. However, from the summary of consultation responses to the Pre-submission draft of the Plan, we note that they make no recommendations regarding capacity issues and any additional burden on the sewage system from potential new development.

We are aware that Great Addington is served by the little Addington Water Recycling Centre. Our records show this does not currently have capacity issues.

However, as capacity can change over time, we would recommend you highlight at an appropriate place in the Plan about the need for it to be ensured there is adequate sewerage infrastructure to serve all new development sites. This is in line with wording the Examiner recently recommended (3 September 2024) for a windfall sites Policy in his report for the Great Oxendon Neighbourhood Plan, in West Northamptonshire.

I hope these comments are of assistance. Should you require any additional information, or wish to discuss these matters further, please do not hesitate to get in touch using the details below.

Yours sincerely

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Sustainable Places Planning Advisor

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