

East Northamptonshire Council  
Planning Policy  
East Northamptonshire House  
Cedar Drive  
Thrapston  
Kettering  
NN14 4LZ

**Our ref:** AN/2012/114626/PO-03/PO1-L01

**Your ref:** RP/LPP2

**Date:** 19 March 2020

Dear Sir/Madam

### **East Northamptonshire District-wide Local Plan Part 2 - Additional sites focused consultation**

#### Land to the west of Moulton College

We have no comments to make on the additional site - Land to the west of Moulton College, Higham Ferrers.

#### Rushden Lakes West

The Land to the west of Rushden Lakes site allocation and the red line boundary is different to the planning application we previously commented on (Your ref: 19/01092/FUL our ref: AN/2019/129221).

The Rushden Lakes site allocation includes an additional area within Flood Zones 1, 2 and 3. A review of the flood extents for the area show that part of this allocation is within Flood Zone 3b 'functional floodplain'.

Your Authority should demonstrate in a clear and transparent manner that development of this site has passed the sequential and/or exception test.

At present, the information fails to acknowledge that the allocation is within the floodplain and demonstration of the sequential test and/or exception test (and sequential approach) appears to be absent.

Section 8.35 of the plan states that:

*8.35 'Accordingly, a 23ha (gross) site to the west of Rushden Lakes and east of Ditchford Lane is allocated for a mixed use development. Any proposals will need to satisfactorily address the following site specific constraints:*

- *East /west former Wellingborough / Higham Ferrers railway cutting landfill;*
- *East / west gas pipeline, parallel with former railway cutting;*
- *Enivonmental conflicts with established uses to the south, such as the A45*

*and industrial areas to the south (e.g. air pollution, noise or odours).*

We strongly suggest that 'flood risk' is added as another environmental constraint that needs to be considered and satisfactorily addressed. There should be no increased risk of flooding as a result of development and where possible, new development should seek to reduce flood risk. Accordingly, the policy wording (ENV27) should be amended to reflect this.

There is a historic landfill (railway cutting) shown on our mapping system within this site. The waste type is stated as inert, however some assessment of any risk posed by land contamination will be required before development. The Joint Core Strategy contains further information on likely requirements and guidance.

We recommend that developers should:

1. Follow the risk management framework provided in the Land contamination: risk management guidance on GOV.UK, when dealing with land affected by contamination.
2. 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.
3. 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.
4. Refer to the contaminated land pages on GOV.UK for more information.

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 faithfully

██████████  
**Sustainable Places - Planning Specialist**

████████████████████

██