ANDREA LEADSOM MP



HOUSE OF COMMONS LONDON SW1A 0AA

Leanne Palmer Major Casework Planning Inspectorate 3/26 Hawk Wing, TQH 2, The Square Bristol BS1 6PN

11th November 2015

Our ref: TG/AL/1511

Your refs: APP/V2825/W/15/3028151 & APP/V2825/W/15/3028155

Dear Ms Palmer.

Further to my letter to you of the 28th October 2015, I write again in relation to the upcoming Planning Appeal inquiry on the proposed development by Bovis Homes in the Northampton Southern Urban Extension. In my last letter, I asked that an extension to Friday 13th November be granted to allow me to incorporate further information; as I have not received a response to reject that proposal, I am moving forwards on the assumption that the Planning Inspectorate is content.

Firstly, let me reaffirm that it is my intention to appear before the Planning Appeal inquiry and that I should like to do this on Friday 11th December. I understand that my colleague David Mackintosh MP, Member of Parliament for Northampton South and the former Leader of Northampton Borough Council, has written to you to outline his desire to also speak on the 11th December, and it would be useful if we could coordinate timings together. I do have a number of other appointments that day, so I would be most grateful if the Planning Inspectorate could advise on times for appearing at your earliest convenience.

The position I am representing is on behalf of my constituents, many of whom live in the local area around the planned Southern Urban Extension and who have grave concerns about the planning process that has been followed. Put simply: local residents do not want this development to go ahead, and local elected representatives have made clear that they do not support the proposals. Northampton Borough Council, through the Planning Committee, have repeatedly expressed alarm over the proposals and refused Bovis Homes' planning application with particular concerns arising over air pollution, flood plain management, and traffic flow.



Anybody familiar with the Northampton area will recognise the existing pressures on the local transport networks, particular the arterial roads that link up to the M1 as it skirts round the town. Whilst progress has been made in recent years to relieve existing capacity issues, these plans are solely focussed on improving the situation for in situ local residents and to manage the current problem. Many constituents to the south of Northampton have queried what impact thousands of new homes nearby will have, and what forethought has been given by Bovis Homes to address the projected increase in traffic flow. Other than Bovis Homes, I have not heard from anybody who thinks that the infrastructure development proposals are anywhere near adequate, and my constituents are firmly of the opinion that the road networks in the area will be crippled if and when the new houses are built.

There is also a significant worry locally about the effect of increased traffic volume on air quality in the area, especially given the proximity of the proposed build to the M1. This is a problem throughout the urbanised parts of the East Midlands, and one I am very familiar with; the particulate pollutants thrown out by HGVs along Watling Street in Towcester are a main driving force behind my campaign for an early delivery of the Towcester Relief Road. Those familiar with the area will know that in 2005 an area along Watling Street in the town centre was declared an Air Quality Management Area (AQMA) because of high levels of nitrogen dioxide, a pollutant which mostly originates from vehicle emissions. Northampton already has a number of AQMAs in place and my constituents have concerns that levels of pollutants around Collingtree, in particular nitrogen dioxide and PM 10s, would increase exponentially with the proposed new houses and extra vehicles on the local roads.

Flooding is a key concern for local residents. Looking at Northampton Borough Council's Northamptonshire Local Flood Risk Management Strategy (NLFRMS), the document makes reference to the flooding problems experienced in the Wootton Brook and Collingtree Park area. I quote from chapter 6 (Assessment of Local Flood Risk in Northamptonshire - Historic Flooding in Northamptonshire) clause 6.7 that states that in June 2007 there were three intense rainfall events falling on a dry catchment, resulted in flooding in the Wootton Brook and Collingtree Park area of Northampton due to channel capacity being exceeded. The NLFRMS document further states that this was a noteworthy flood incident. Clause 7.5.48 of NLFRMS, under the sub-section of Strategy Objectives for Managing Local Flood Risk: Increase Standards of Protection, it is made clear that 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.

However referring to a letter dated 5th December 1983 from Ivor Collis, Rivers Area Manager (Northampton) at Anglian Water, to the Northampton Development Corporation it is clear that the Wootton Brook Improvement Scheme was designed to provide a 1 in 50 year protection against flooding to a 2km length of the brook. This was to enable development at the time within the existing flood plain using a minimum works scheme i.e. sufficient works to maintain the status quo allowing for the increased rate of run-off from the developing areas. The letter



from Anglian Water concludes with the point that any further development in excess of that allowed in the design will obviously reduce the standard of protection provided. This position is further supported by the Environment Agency in a letter dated 8th August 2007 from the Area Planning & Corporate Services Manager Roger Ashford which outlines the approximate standards of protection offered for the Lower Wootton Brook area which were at the time 1 in 10; a reduction from the protections afforded in 1983. The letter notes that the Wootton area does not fall within the standards set by Defra's range of Indicative Standards of Protection for the land use at risk. This is noted in the minutes of a meeting of Wootton & East Hunsbury Parish Council on the 24th October 2007: the Environment Agency confirmed that parts of Wootton, along Walkers Way, were only protected to a 1 in 10 year standard. Works to raise the defence standard are included in the Agency's Medium Term Plan, subject to a more comprehensive justification and funding. Concerns were raised at the meeting that if further houses are built around Wootton Fields, Wootton Brook would not be able to cope with the extra surface water runoff, and water levels in the area have been known to rise by one foot in ten minutes [www.woottonpc.co.uk/documents/minutes/mins%20pc%202007-10.pdf]. I have written to John Curtin, Acting Executive Director of Flood and Coastal Risk Management at the Environment Agency, for an update on the Medium Term Plan for Wootton Brook; although I have not received a response in time for this submission.

It seems clear that advice against further development around the Wootton Brook area, including Collingtree, has been known for decades, and local residents know from first-hand experience the devastation that is caused when significant flood events occur. This would only get worse with more housing on a flood plain area and without significant investment in mitigation on behalf of the developers and the Environment Agency.

It is not a case of 'NIMBYism' nor are these local residents objecting for the sake of it, quite the reverse – these are very involved and concerned local people who have a strong attachment to their community and want to see it improved for the benefit of all. I refer here to the Position Statement on the adoption of West Northamptonshire Joint Core Strategy Part 1 Local Plan, discussed at a meeting of Northampton Borough Council on the 19th January 2015, in which Councillor Tim Hadland sought to clarify the Council's position on Collingtree www.northamptonboroughcouncil.com/councillors/mgAi.aspx?ID=43494]. I quote from the report: Collingtree was not sustainable as an area for a SUE due to flooding, transport and infrastructure, which were the reasons for rejecting the Joint Core Strategy's recommendations.

At that meeting, the point was very clearly made that the needs of Northampton and its residents were largely being ignored by what they feel is an undemocratic West Northamptonshire Joint Strategic Planning Committee. The Council stated its position that local people were not against development but that there was a need for the infrastructure to be in place at the same time as the home-building. This is a position that my constituents have echoed time and again to me, and one that I put very strongly to the Planning Appeal inquiry.

Collingtree Parish Council, East Hunsbury Parish Council, Hunsbury & Collingtree Residents Alliance, Collingtree Park Residents Association, Wootton Brook Action Group, and others have long voiced their objections to the planning proposals at Collingtree. The persistence in

pushing ahead with the development at Collingtree runs counter to the wishes of local residents, and contradicts the Government's localism agenda. As a local Member of Parliament, I have championed the aim of putting power back into the hands of local people to decide planning matters. The views of local parish councils, local action groups, and my constituents is clear.

Please accept this letter as my submission on behalf of the many constituents who have raised their concerns with me and who have asked me to voice their objections at the Planning Appeal inquiry. As I have indicated, I intend to appear before the inquiry with my colleague David Mackintosh MP on Friday 11th December and I would be happy to talk further on any of the points that I have mentioned. If you should like to see copies of the documents I have referred to in this letter, I would be happy to provide these in advance or at the inquiry meeting itself. As I have noted above, I have not received a response from the Environment Agency on my query about the implementation of the Medium Term Plan for Wootton Brook and I may write a short letter to you in the interim if this is received before I appear before the inquiry.

With best wishes,

Andrea Leadsom MP

Member of Parliament for South Northamptonshire

andrea leadson