

G114.1 Wereham – Land at the Springs, Flegg Green

Flood Risk	Statutory consultee comments	Flood Risk - Noted in the Sustainability Appraisal	Council's Approach in the proposed SADMP policy	Agents / Land owner response
Flood Zone 1	<p>Miss Emily Crook (ID: 476133), The Environment Agency:</p> <ul style="list-style-type: none"> We have reviewed the draft allocations set out within Section G and have no objection. We consider that flood risk to these sites can be adequately addressed at full planning stage by the application of draft policy DM21 (Sites in Areas of Flood Risk). <p>Mr Gerald Allison (ID: 890622) , Stoke Ferry IDB:</p> <ul style="list-style-type: none"> Southery IDB comment that the name Springs indicates there is surface water present and although the site is outside of their boundary it is in their catchment, pointing out that the presence of springs may result in soakaways not being possible 	<p>‘+’ The site is within an area of low flood risk</p>	<ul style="list-style-type: none"> Submission of details showing how sustainable drainage measures will integrate with the design of the new development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission The detail of the scheme can be developed in consultation with Norfolk County Council, as the Lead Local Flood Authority, and the IDB at the design process stage that would inform a detailed planning application Having liaised with Development Control regarding the IDB comments they are confident there is a design solution. This has been and is current practice with planning 	<ul style="list-style-type: none"> Response from Agent (Appendix 6) states that the development is possible.

Flood Risk	Statutory consultee comments	Flood Risk - Noted in the Sustainability Appraisal	Council's Approach in the proposed SADMP policy	Agents / Land owner response
			applications.	



© Crown copyright and database rights 2014
Ordnance Survey 100024314

Wereham

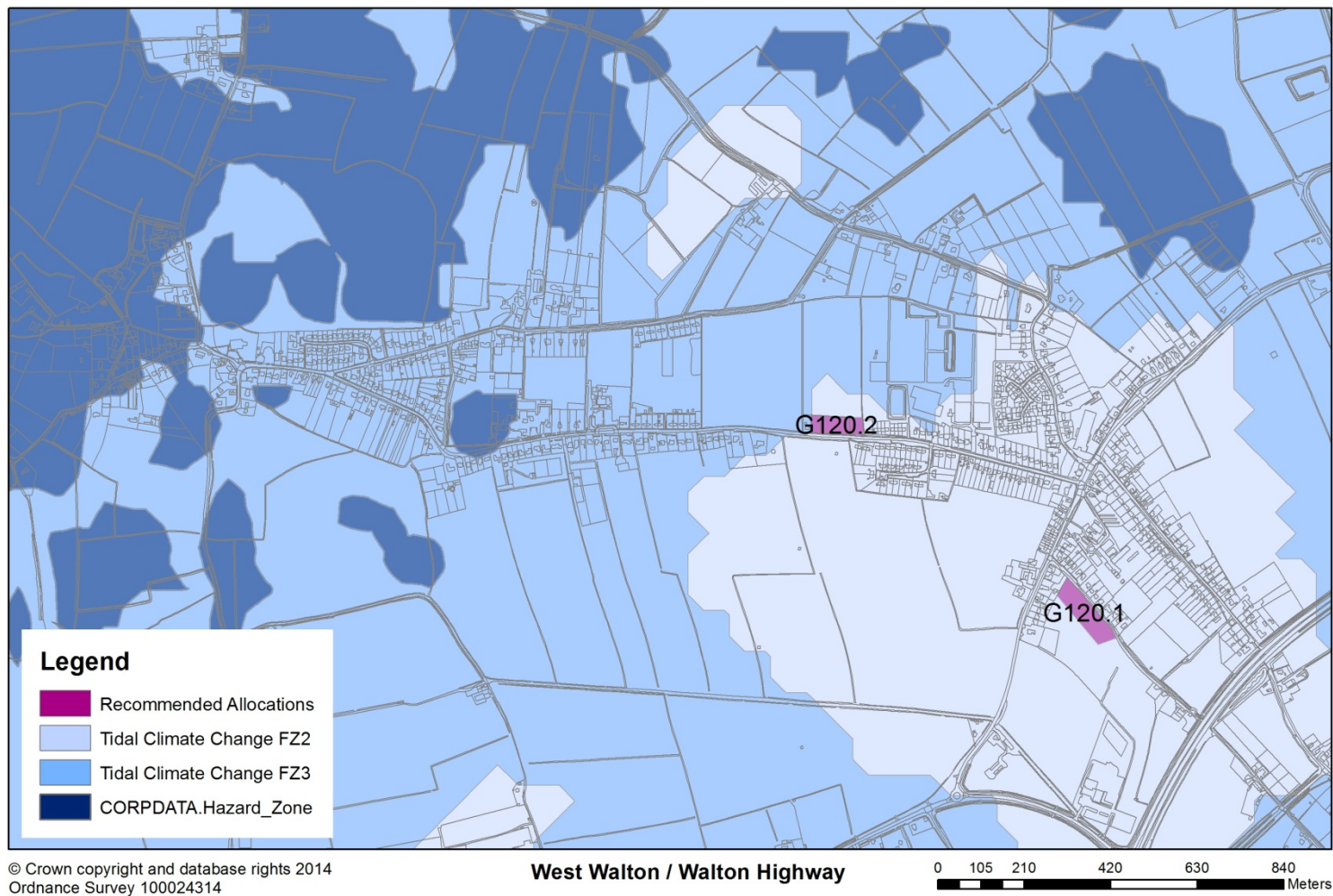
0 65 130 260 390 520
Meters

G120.1 Walton Highway – Land adjacent Common Road

Flood Risk	Statutory consultee comments	Flood Risk - Noted in the Sustainability Appraisal	Council's Approach in the proposed SADMP policy
Flood Zone 2	<p>Miss Emily Crook (ID: 476133), The Environment Agency:</p> <ul style="list-style-type: none"> We have reviewed the draft allocations set out within Section G and have no objection. We consider that flood risk to these sites can be adequately addressed at full planning stage by the application of draft policy DM21 (Sites in Areas of Flood Risk). 	<p>'x' The site is subject to medium flood risk (food zone 2)</p>	<ul style="list-style-type: none"> Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures) Submission of details showing how sustainable drainage measures will integrate with the design of the new development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission

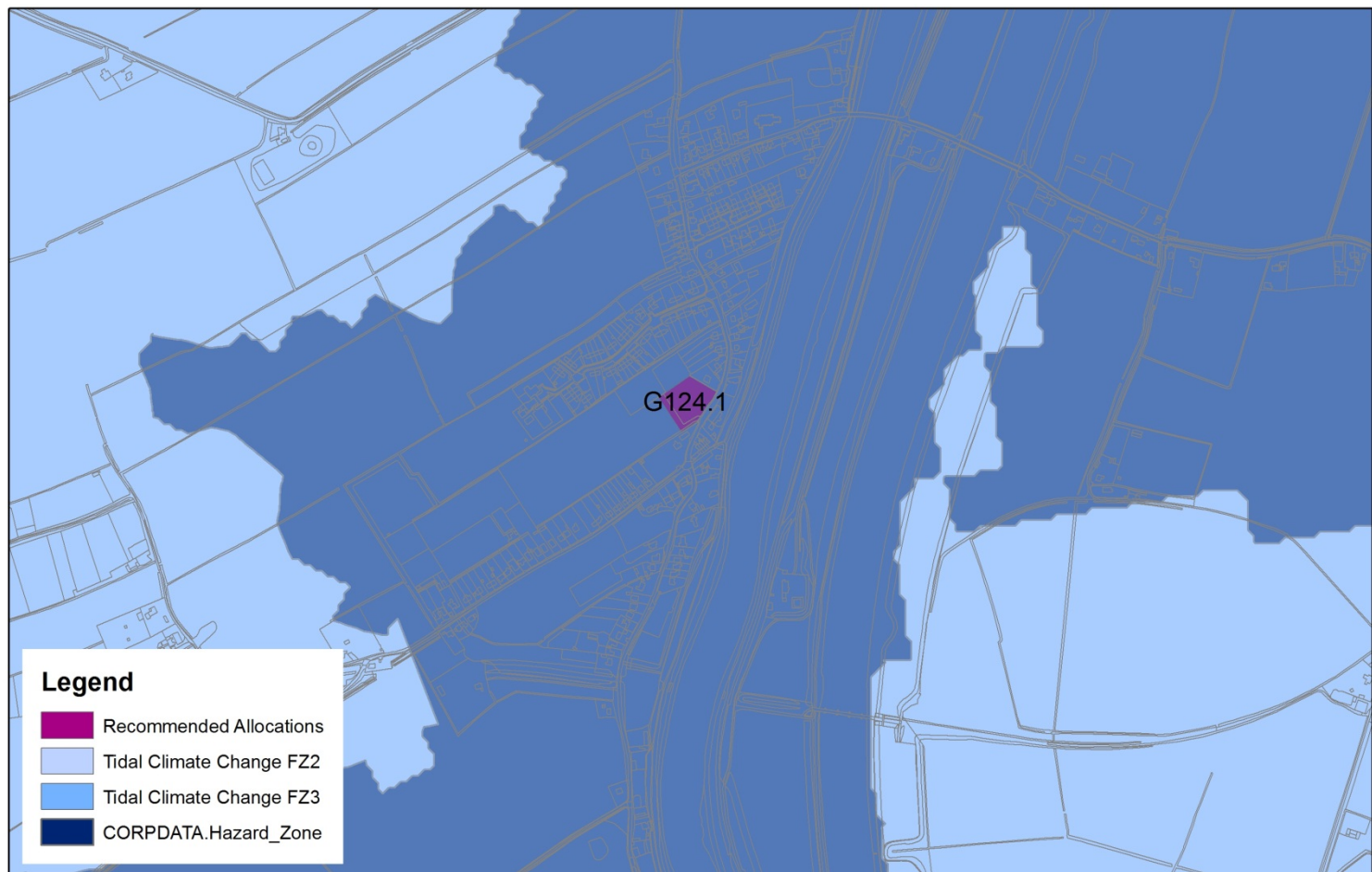
G120.2 Walton Highway – Land north of School Road

Flood Risk	Statutory consultee comments	Flood Risk - Noted in the Sustainability Appraisal	Council's Approach in the proposed SADMP policy
Flood Zone 2 & Partial Flood Zone 3	<p>Miss Emily Crook (ID: 476133), The Environment Agency:</p> <ul style="list-style-type: none"> We have reviewed the draft allocations set out within Section G and have no objection. We consider that flood risk to these sites can be adequately addressed at full planning stage by the application of draft policy DM21 (Sites in Areas of Flood Risk). 	<p>'xx' The site is mostly constrained by medium flood risk (FZ2) although a small part of the site is within a high flood risk area (FZ3).</p>	<ul style="list-style-type: none"> Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures) Submission of details showing how sustainable drainage measures will integrate with the design of the new development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission



G124.1 Wiggenhall St Mary Magdalen – Land on Mill Road

Flood Risk	Statutory consultee comments	Flood Risk - Noted in the Sustainability Appraisal	Council's Approach in the proposed SADMP policy
Flood Zone 3 & Hazard Zone	<p>Miss Emily Crook (ID: 476133), The Environment Agency:</p> <ul style="list-style-type: none"> We have reviewed the draft allocations set out within Section G and have no objection. We consider that flood risk to these sites can be adequately addressed at full planning stage by the application of draft policy DM21 (Sites in Areas of Flood Risk). 	<p>'xx' All sites within this settlement lie within a high risk area (FZ3)</p>	<ul style="list-style-type: none"> Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures) Submission of details showing how sustainable drainage measures will integrate with the design of the new development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission



© Crown copyright and database rights 2014
Ordnance Survey 100024314

Wighenhall St Mary Magdalen

0 75 150 300 450 600
Meters

Table of Sites Proposed for Allocation within the SADMP and the Risk to Flooding

Settlement	Site Ref	Allocated Site Area (Ha)	Dwelling Allocation	Flood Risk	SUDS
King's Lynn	E1.4	5.3	170	Portion Flood Zone 2	✓
	E1.5	4.13	350	Flood Zone 2 & 3 & Hazard Zone	✓
	E1.6	8.88	260	Portion Flood Zone 2	✓
	E1.7	13.72	450	Portion Flood Zone 2 & 3	✓
	E1.8	0.49	50	Flood Zone 2 & 3, Portion Hazard Zone	✓
	E1.9	3.29	100	Portion Flood Zone 2 & 3	✓
	E1.10	3.8	50	Flood Zone 2 & Portion 3 & Hazard Zone	✓
	E1.11	0.19	20	Portion Flood Zone 2	✓
West Lynn	E1.14	2	49	Flood Zone 2	✓
	E1.15	2.58	200	Flood Zone 2	✓
West Winch	E2.1	171	1,600	Flood Zone 1	✓
South Wootton	E3.1	40.3	300	Portion Flood Zone 2	✓
Knights Hill	E4.1	36.9	600	Flood Zone 1	✓
Downham Market	F1.3	16.25	250	Flood Zone 1	✓
	F1.4	13.19	140	Flood Zone 1	✓
Hunstanton	F2.2	6.23	120	Flood Zone 1	✓
	F2.3	4.95	50	Flood Zone 1	✓
	F2.4	11.24	163	Portion Flood Zone 2 & 3	✓
Wisbech Fringe	F3.1	25.34	550	Flood Zone 1	✓

Settlement	Site Ref	Allocated Site Area (Ha)	Dwelling Allocation	Flood Risk	SUDS
Brancaster	G13.1	0.57	5	Flood Zone 1	✓
Burnham Deepdale (Brancaster Staithe)	G13.2	0.69	10	Flood Zone 1	✓
Burnham Market	G17.1	2.71	32	Flood Zone 1	✓
Castle Acre	G22.1	1.14	15	Flood Zone 1	✓
Clenchwarton	G25.1	0.3	10	Flood Zone 3	✓
	G25.2	1.07	20	Flood Zone 3	✓
	G25.3	1.17	20	Flood Zone 3	✓
Dersingham	G29.1	1.84	20	Flood Zone 1	✓
	G29.2	0.29	10	Flood Zone 1	
Docking	G30.1	3.41	20	Flood Zone 1	✓
East Rudham	G31.1	0.42	10	Flood Zone 1	
East Winch	G33.1	0.77	10	Flood Zone 1	
Emneth	G34.1	1.14	36	Flood Zone 1	
Feltwell	G35.1	0.69	15	Flood Zone 1	✓
	G35.2	3.6	40	Flood Zone 1	✓
	G35.3	0.26	10	Flood Zone 1	✓
Hockwold	G35.4	0.19	5	Flood Zone 1	✓
Fincham	G36.1	0.46	5	Flood Zone 1	✓
Gayton	G41.1	2.8	23	Flood Zone 1	✓

Settlement	Site Ref	Allocated Site Area (Ha)	Dwelling Allocation	Flood Risk	SUDS
Grimston & Pott Row	G41.2	1.32	23	Flood Zone 1	✓
Great Bircham	G42.1	0.58	10	Flood Zone 1	✓
Great Massingham	G43.1	0.62	12	Flood Zone 1	✓
Harpley	G45.1	0.35	5	Flood Zone 1	
Heacham	G47.1	6.08	60	Flood Zone 1	✓
	G47.2	1.3	6	Flood Zone 1	✓
Hilgay	G48.1	0.63	12	Flood Zone 1	
Hillington	G49.1	0.31	5	Flood Zone 1	✓
Ingoldisthorpe	G52.1	0.7	10	Flood Zone 1	✓
Marham	G56.1	3.6	50	Flood Zone 1	
Marshland St James	G57.1	0.85	15	Flood Zone 3	✓
	G57.2	0.73	10	Flood Zone 3	✓
Methwold	G59.1	0.23	5	Flood Zone 1	✓
	G59.2	1.12	25	Flood Zone 1	✓
	G59.3	0.59	10	Flood Zone 1	✓
	G59.4	0.51	5	Flood Zone 1	✓
Middleton	G60.1	0.5	15	Flood Zone 1	✓
Runcton Holme	G72.1	0.92	10	Flood Zone 1	✓

Settlement	Site Ref	Allocated Site Area (Ha)	Dwelling Allocation	Flood Risk	SUDS
Sedgeford	G78.1	0.56	10	Flood Zone 1	✓
Shouldham	G81.1	0.3	5	Flood Zone 1	
	G81.2	0.29	5	Flood Zone 1	
Snettisham	G83.1	1.48	34	Flood Zone 1	✓
Southery	G85.1	1.22	15	Flood Zone 1	✓
Stoke Ferry	G88.1	0.45	5	Flood Zone 1	✓
	G88.2	0.7	10	Flood Zone 1	✓
	G88.3	0.54	12	Flood Zone 1	✓
Syderstone	G91.1	0.29	5	Flood Zone 1	✓
Ten Mile Bank	G92.1	0.23	5	Flood Zone 3 & Hazard Zone	✓
Terrington St Clement	G93.1	0.51	10	Portion Flood Zone 2	
	G93.2	0.73	17	Portion Flood Zone 2	
	G93.3	2.23	35	Portion Flood Zone 2	
Terrington St. John, St. John's Highway & Tilney St. Lawrence	G94.1	2.82	35	Flood Zone 2	✓
Three Holes	G96.1	0.31	5	Flood Zone 3	✓
Tilney All Saints	G97.1	0.26	5	Flood Zone 2	✓
Upwell	G104.1	0.48	15	Flood Zone 1	
	G104.2	0.34	5	Flood Zone 1	
	G104.3	0.32	5	Flood Zone 1	

Settlement	Site Ref	Allocated Site Area (Ha)	Dwelling Allocation	Flood Risk	SUDS
	G104.4	2	15	Flood Zone 1	
Outwell	G104.5	0.33	5	Flood Zone 1	
	G104.6	2.08	35	Flood Zone 1	
Walpole Highway	G106.1	0.82	10	Portion Flood Zone 2	✓
Walpole St. Peter / Walpole St. Andrew / Walpole Marsh	G109.1	0.85	10	Flood Zone 1	✓
	G109.2	1.44	10	Flood Zone 1	✓
Watlington	G112.1	1.82	32	Flood Zone 1	
Welney	G113.1	0.25	7	Flood Zone 3 & Portion Hazard Zone	
	G113.2	1.25	13	Flood Zone 3	
Wereham	G114.1	1.54	8	Flood Zone 1	✓
Walton Highway/West Walton	G120.1	0.83	10	Flood Zone 2	✓
	G120.2	0.54	10	Flood Zone 2, Portion Flood Zone 3	✓
Wiggenhall St. Mary Magdalen	G124.1	0.51	10	Flood Zone 3 & Hazard Zone	✓

Planning Applications in Similar Locations and Risk to Flooding as Sites Proposed for Allocation within the SADMP

Site	Application No.	Development Proposed	Flood Risk	Relationship to SADMP Site	Flood Risk Assessment	Flood Risk Assessment acceptable	Planning Status
King's Lynn Silos Ltd South Quay King's Lynn Norfolk PE30 5DT	14/00534/FM	37 dwellings Erection of retirement living housing for the elderly (Cat II type accommodation), communal facilities, landscaping and car parking	Flood Zone 2, 3 & Hazard Zone	Part of E1.8 King's Lynn	YES	Accepted by the EA	Granted
Land At Wootton Road Gaywood King's Lynn Norfolk PE30 4BP	10/01361/NMAM_1 09/00649/F 06/00428/OM	Construction of 125 dwellings , including 35 affordable units and associated public open space	Flood Zone 3	Similar area and flood risk as E1.4 & E1.7 King's Lynn	YES	Accepted by the EA	Granted & Development completed
Land South of Russett Close King's Lynn Norfolk	14/01690/OM	construction of up to 81 dwellings , access road (including bridge), cycle and pedestrian routes, landscaping and open space	Flood Zone 3	Similar area and flood risk as E1.4 & E1.7 King's Lynn	YES	Accepted by the EA	Appeal in Progress (30/07/2015)
Yours South Lynn Nar Ouse Regeneration Area (NORA) Wisbech Road King's Lynn Norfolk	09/02035/RMM 11/01106/RMM 11/00406/RMM 12/01210/RMM	900 dwellings 20 ha business park and associated residential and commercial development, as well as a 3 ha site for mixed	Flood Zone 2 & 3	Similar flood risk to sites in King's Lynn & West Lynn	YES	Accepted by the EA	Granted , some dwellings completed and currently under construction

Site	Application No.	Development Proposed	Flood Risk	Relationship to SADMP Site	Flood Risk Assessment	Flood Risk Assessment acceptable	Planning Status
	12/00414/RMM 2/01/0670/O 2/01/1671/O 05/00691/OM 9/2010/F	use and large areas of open space and landscaping.					
Land Off St Peters Road West Lynn King's Lynn Norfolk	12/01728/FM	149 dwellings Proposed care village	Flood Zone 2 & portion Flood Zone 3	Similar flood risk to sites in King's Lynn & West Lynn	YES	Accepted by the EA	Granted
Land Between Railway Road And Richmond Road Downham Market Norfolk	13/01664/FM	Residential Development of 97 dwellings with public open space (including demolition of existing dwelling)	Flood Zone 1	Similar to the two allocations at Downham Market	YES	Accepted by the EA	Granted , some dwellings completed and under construction
Land At Foundry Field Burnham Market Norfolk PE31 8HG	13/01810/FM	Construction of 32 new dwellings , the provision of a public car park (186 spaces), retail units (Class A1, A2 or A3), public toilets and public open space and proposed Pedestrian Works and the demolition of the former day care centre and replacement with dwelling (previously approved under planning reference 10/01582/F)	Flood Zone 1	This is Site G17.1	YES	Accepted by the EA	Granted
Land West Of 36 Smallholdings	07/02132/F	Construction of 14 affordable	Flood Zone 3	Similar risk to allocations at	YES	Accepted by the	Granted / Lapsed

Site	Application No.	Development Proposed	Flood Risk	Relationship to SADMP Site	Flood Risk Assessment	Flood Risk Assessment acceptable	Planning Status
Road Clenchwarton King's Lynn Norfolk PE34 4DY		dwelling s		Clenchwarton		EA	
224 Smeeth Road Marshland St James Wisbech Norfolk PE14 8ES	14/01639/F	Proposed 2 new dwelling s	Flood Zone 3	Similar risk to allocations at Marshland St James	YES	Accepted by the EA	Granted
Land And Buildings S of Narrow Brook Church Road Ten Mile Bank Norfolk	15/00438/OM	Erection of 3 dwelling s	Flood Zone 3 & Hazard Zone	This is part of G92.1	YES	Accepted by the EA	Pending
Land South of The Saltings Terrington St Clement Norfolk	12/01899/OM	Residential development of 41 dwelling s	Flood Zone 1	Similar location and risk to those allocations at Terrington St Clement	YES	Accepted by the EA	Granted
Playing Field School Road Terrington St John Norfolk	15/00438/OM	Residential development of 35 dwelling s	Flood Zone 2	This is Site G94.1	YES	Accepted by the EA	Pending
72 Small Lode Upwell Norfolk PE14 9BG	13/01405/F	4 dwelling s Proposed 4x3bed semi-detached dwellings (retrospective)	Flood Zone 1	Similar location and risk to those allocations at Upwell	NO	N/A	Granted

Site	Application No.	Development Proposed	Flood Risk	Relationship to SADMP Site	Flood Risk Assessment	Flood Risk Assessment acceptable	Planning Status
Land At the End of Birdbeck Drive Outwell	12/01989/FM	15 dwellings Development of 15 affordable residential units with associated landscaping, parking and highways works	Flood Zone 1	Similar location and risk to those allocations at Outwell	NO	N/A	Granted
Dayford New Road Welney Wisbech Norfolk PE14 9RA	14/00612/O	Demolish dwelling and construct two 3-bed houses and garages (3 dwellings)	Flood Zone 3	Similar location and risk to those allocations at Welney	YES	Accepted by the EA	Granted
The Springs Flegg Green Wereham King's Lynn Norfolk PE33 9BA	11/01623/F	Construction of 4 dwellings following demolition of existing dwelling	Flood Zone 1	Land to the front of Site G114.1	NO	N/A	Granted & Constructed
White House Farm Lynn Road West Walton Highway Wisbech Norfolk PE14 7DB	10/00717/F	Completion and retention of 8 dwellings	Flood Zone 2	Similar location and risk to those allocations at Walton Highway	YES	Accepted by the EA	Granted
Barns Adjacent Holley House Stow Road Wiggenhall St Mary Magdalen King's Lynn Norfolk PE34 3BD	13/00951/F	Conversion of existing barn into 2 dwellings	Flood Zone 3 & Hazard Zone	Similar location and risk to the allocation at Wiggenhall St Mary Magdalen	YES	Accepted by the EA	Granted

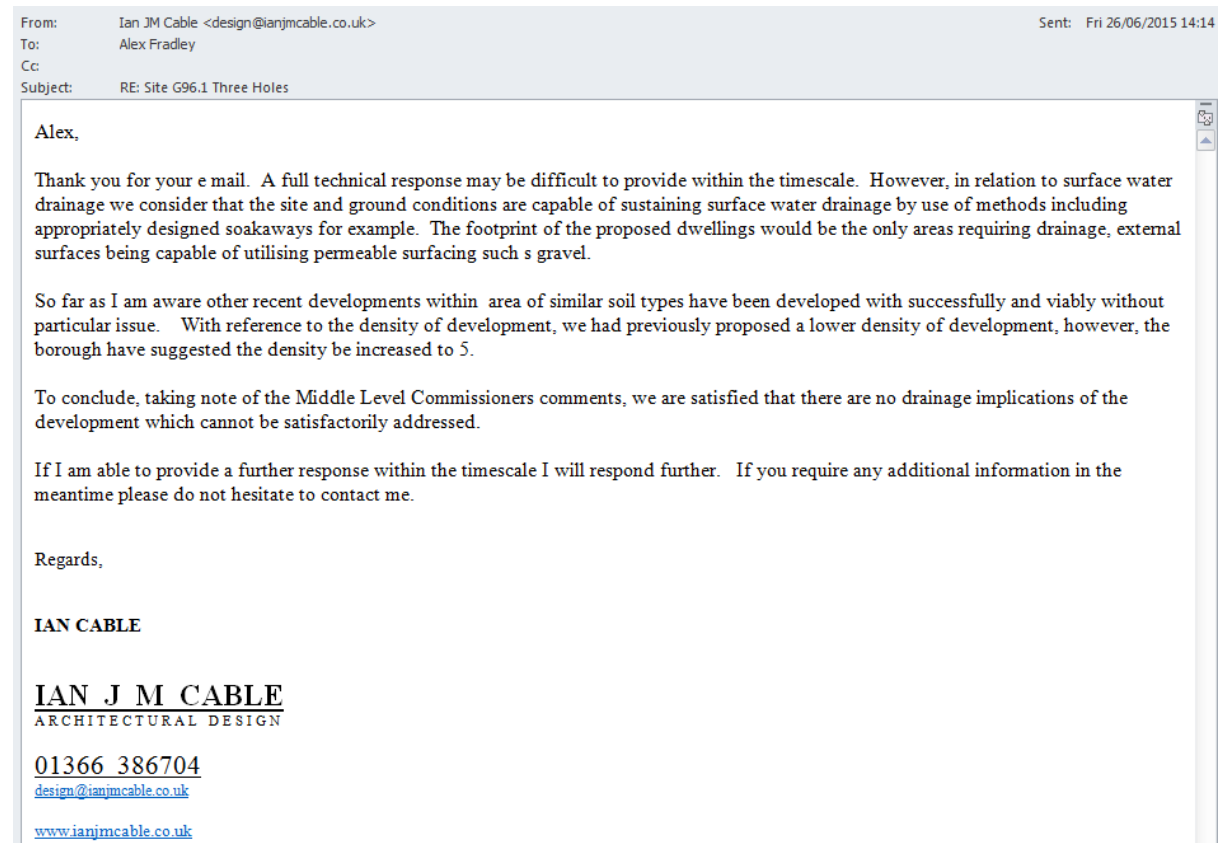
Conclusion

This document has highlighted the agreed method between BCKLWN & EA for allocating sites in areas at risk of flooding and agreed design guidance for development within areas at risk of flooding. It identifies the proposed sites for allocation within the SADMP and the flood risk at these locations, demonstrating that the EA, the overall body responsible for avoiding dangerously located development, do not raise objection to any of the proposed sites for allocation.

There have clearly been applications and permissions granted for similar developments, as proposed by the SADMP, in terms of location, size and flood risk.

Comments received from Internal Drainage Boards as a result of the SADMP representation stage (January / February 2015) have been taken into consideration, and in consultation with our Development Control section and the relevant site agents / owners, the BCKLWN are confident that there are design solutions available. The detail of the schemes can be developed in consultation with Norfolk County Council, as the LLFA, and the relevant IDBs at the detailed design stage, that would inform a detailed planning application, which would be commented upon by the EA and LLFA. This would ensure that the development of the proposed sites for allocation could come forward as envisaged by the SADMP.

Appendix 1. Site G96.1 Agent's Comments



Continued over page

From: Ian JM Cable <design@ianjmcable.co.uk>
To: Alex Fradley
Cc:
Subject: RE: Site G96.1 Three Holes

Sent: Thu 02/07/2015 10:16

Alex,

Further to my e mail, our consulting drainage engineers have confirmed that drainage to the site is not considered to be a problem and that attenuated drainage can be accommodated so as not to increase the run off rate from the site. See summary not below if infiltration soakaways alone will not suffice.

I trust this assists in confirming the suitability and deliverability of the site.

Dear Ian

With reference to Site 488: Land at The Bungalow, Three Holes we would anticipate that the drainage system would consist of an unlined attention tank to benefit from any limited infiltration available, this would then outfall to the adjacent field drainage ditch. Discharge into the ditch will be restricted to the greenfield runoff rate to ensure the proposed site does not increase the risk of surface water flooding off-site. Due to the low density of development space is available to accommodate the drainage system

Kind Regards

Matt Hare B.Sc EngTech TMICE
Water and Drainage Engineer

For and on behalf of Plandescil Ltd
Connaught Road, Attleborough, Norfolk. NR17 2BW
Tel: 01953 452001 Fax: 01953 456955
Registered in England No.1447113

Regards,

IAN CABLE


IAN J M CABLE
ARCHITECTURAL DESIGN

01366 386704
design@ianjmcable.co.uk
www.ianjmcable.co.uk

Appendix 2. Site G104.1 & G104.4 Agent's Comments

Re: Site G104.1 & G104.4 Upwell

G Seaton <gas@grahamseaton.co.uk>

 You replied to this message on 26/06/2015 14:41.

Sent: Fri 26/06/2015 14:08
To: Alex Fradley
Cc: Anglia Building Consultants

Hi Alex,
PoicyG104.1 Land N.W. of Townley Close.
This is now 5 dwellings, please confirm.
M.L.C. are wrong about use of soakaways.
In our experience soakaways work perfectly well in this area but in anycase
percolation tests will be carried out to determine type and size.
I await your comments.
Grahame.

Grahame Seaton Design Limited
Design and Planning Consultant
67 St Peters Road,
Upwell,
Norfolk
PE14 9EJ
01945 772632

Re: Site G104.1 & G104.4 Upwell

G Seaton <gas@grahamseaton.co.uk>

Sent: Fri 26/06/2015 15:03
To: Alex Fradley
Cc: John Maxey (Maxey Grounds & Co LLP)

Hi Alex,
Policy G104.4 Land off St Peters Road Upwell.
I am quite amazed at these late ,late comments from the M.L.C.
Obviously all of their points can be addressed and we can instruct experts if
needed but of course this takes time.
I will however make the following points;
1. No proposed new dwellings are within the M.L.C. 20M maintenance strip.
2. I am fully aware the importance of the Well Creek Waterway as I have been
Chairman of the Well Creek Trust Ltd for over 20 years
and was a member when in 1972 the Well Creek was Unusable and un-navigable
due to neglect.
3. Navigation will not be affected by proposals.
4. The 2 approved houses face onto the Well Creek.
5. The 2 dwellings will indeed enhance the riverside corridor.
6. No surface water will go directly into the Well Creek .
7. No surface water will go into Churchfield and Plawfield system.
8. Surface water will be discharged into soakaways subject to a satisfactory
percolation test to latest B.S.
9. I dispute the ground condition stated by M.L.C. In my experience the ground in
this area is mainly silt with a water table
at about 2M to 3M below the surface.
10. There are usually no long term maintenance issues.
11. The proposed 15 dwellings are on large sites and will not increase the flood risk.
Please contact me when you receive this email
Grahame

Grahame Seaton Design Limited
Design and Planning Consultant
67 St Peters Road,
Upwell,
Norfolk
PE14 9EJ
01945 772632

Appendix 3. Site G104.2 Land owner's Comments

Alex Fradley

From: jon <jon@jonnyhelen.org>
Sent: 06 July 2015 10:50
To: Alex Fradley
Subject: Policy G104.2 Upwell (formerly UPW2)

Dear Alex,

Thank you for your recent letter and the time for our phone call this morning. I understand from our conversation that the Middle Level Commissioners have recently expressed some concerns about most of the proposed sites in Upwell and Outwell. To confirm the points from the phone call:

The site is bounded by a drain that goes along either side of the field (the Townley close border and the Listers Road side). Both of these side drains empty into the Board drain that runs alongside New road. The Listers Road side drain had some maintenance work carried out in Jan 2011 to ensure smooth running. The board drain now runs partly underground which was carried out some years ago as part of the New Road, road widening scheme.

The field has been owned by our Family for many years (the orchard was initially planted by my grandfather in 1917) and there is no history of this field being subject to flooding.

If you need to contact either my Brother or I, please feel free to use this email address (jon@jonnyhelen.org) or alternatively our mobile phone numbers are:

Jon Bradley: [REDACTED]

Simon Bradley: [REDACTED]

If you need any further information (or you think the notes above would benefit either from clarification or expansion of detail) please don't hesitate to contact us.

Your sincerely,

Jon Bradley.

Appendix 4. Site G104.3 Land owner's Comments

From:	KATE BENNETT <katebennett@btinternet.com>	Sent:	Wed 01/07/2015 12:56
To:	Alex Fradley		
Cc:	Prue Lester; Jill Gooch; Andrew Harrison; Ros Shorting; Margaret Hodgson; Jonathan Schultz; Cllr Chris Crofts		
Subject:	Re: Site G104.1 & G104.4 Upwell		

Good Afternoon Alex

Upwell Parish Council would like to point out that the nearest drainage dyke to the proposed site is about 125 yards away and this connects to the board's maintained drain. Any water run-off from the Scholars Way development adjacent feeds into this so the proposed site should be able to also, if deemed necessary.

Please also note that it is possible for up to 7 properties to be serviced from a self-maintained permeable gravel roadway and the proposed site has only 5 allocated to it.

Many thanks.

Regards,

Kate

Kate Bennett
Clerk
Upwell Parish Council

Appendix 5. Site G104.6, G133.1 & G113.2 Agent's Comments

From: John Maxey (Maxey Grounds & Co LLP) <jmaxey@maxeygrounds.co.uk>
To: Alex Fradley
Cc:
Subject: RE: Outwell & Welney Sites

Sent: Fri 26/06/2015 16:23

Mr Fradley

I note Middle Level's comments. With respect to them as the IDB, it is their habit to flag up on all consultations that are at "outline "stage all potential barriers to development rather than considering how these can be overcome.

G104.6 (OUT2) which is for 35 units on 2 ha is at a density where there is ample scope for a SUDS scheme to be designed and accommodated on site, either to infiltrate or to attenuate to Greenfield run off rates. The detail of any drain improvement which is likely to be minor if flows are attenuated, can be determined at the detailed design stage.

G.113 (WEL1) is a site for only 7 units which previously had consent. My client Elgood and Sons Ltd owns significant amounts of land adjoining the allocation site which could be utilised for SUDs infiltration or attenuation if required. MLC have identified a discharge route in their consultation if one is required because infiltration by soakaways is not suitable.

G113.2 (Site 376) is again a low density site (13 on 2 Ha) with a board drain adjoining to be able to accept discharge and space on site to infiltrate or attenuate to Greenfield run off rates.

I would thus suggest that in all of these cases a satisfactory form of surface water drainage is achievable. The detail of these schemes can be developed, in consultation with both the LLFA and MLC as part of the design process leading to a planning application. I believe the IDB is unduly pessimistic as to the ability of these relatively low density sites to accommodate the necessary drainage provision, and the viability of the schemes to enable delivery. You will note that all their comments are phrased "may be" rather than will be, and should be, in my view, considered precautionary rather than indicating insurmountable constraint.

Regards

John Maxey MA(Cantab), FRICS, FAAV
For and On Behalf of Maxey Grounds & Co LLP

MAXEY
GROUNDS
& CO

1-3 South Brink
Wisbech
Cambridgeshire
PE13 1JA

Tel: 01945 583123
Email: jmaxey@maxeygrounds.co.uk
www.maxeygrounds.co.uk

This email is intended for the addressee only. It may contain confidential or privileged information and its use, copying or distribution is prohibited. If it is received by someone other than the intended recipient please return it to the sender immediately and delete it from your computer.

Maxey Grounds & Co LLP accepts no liability for the accuracy or completeness of the information contained in this email.

117 | Page

Appendix 6. Site G114.1 Agent's Comments

IAN J M CABLE



01366 386704

design@ianjmcable.co.uk

A R C H I T E C T U R A L D E S I G N
37 Church Road, Wimbotsham, King's Lynn, Norfolk, PE34 3QG

Planning Department,
BCKLWN,
King's Court,
Chapel Street,
King's Lynn,
Norfolk,
PE30 1EX

445.22

2nd October 2013

Attn. Alan Gomm.

Dear Sirs,

**RE King's Lynn & West Norfolk Local Plan:
Detailed Policies and Sites Plan 'Preferred Options' (Regulation 18) Consultation 2013**

Representation of behalf of: Mr L Forbes, Crimplesham.

Please find enclosed comments on behalf of my client in respect of the above. Please accept this representation as an individual response and post against the appropriate policies and sites as shown, giving appropriate weight to the comments.

I trust the enclosed with e mail provides sufficient information. However, should you require any additional information or expansion on any element, please contact me.

Yours faithfully,

Ian Cable

IAN CABLE

Enc.

Kings Lynn and West Norfolk Local Plan

Detailed Policies and Sites Plan 'Preferred Options' (Regulation 18) Consultation

Response to Proposed Wereham Policies:

Wereham:

Proposed Development Boundary:

The proposed development boundary is agreed in principle.

It is suggested that the development boundary could be extended to include the proposed site WER 1.

Policy WER 1:

Support:

The proposed site allocation is supported for the following reasons:

- The proposed site allocation WER 1 is available and deliverable.
- It provides a logical extension to the existing development to the east.
- WER 1 is capable of supporting the level of development allocated to the village on a pro rata basis.
- The site is in close proximity to the village centre and amenities with footway link to provide safe access.
- Appropriate access is available via the existing development without the need for an additional junction onto Flegg Green.
- The site does not require direct access on to the A134 main arterial route.
- The site will have minimal impact on the open countryside with good natural screening which may be enhanced as part of any future development.
- It is considered that any groundwater/contamination issues may be overcome.

It is considered that WER 1 provides the most suitable site within the village and that there are no other more suitable sites.

Appendix 7. The role of the Middle Level Commissioners & Internal Drainage Boards in the Borough

The Middle Level Commissioners (MLC)

The MLC are a statutory corporation created under the Middle Level Acts 1810-74 and operating also under the Land Drainage Act 1991, the Flood and Water Management Act 2010 and the Nene Navigation Act 1753.

The Commissioners' primary functions comprise the provision of flood defence and water level management to the Middle Level area, and as navigation authority for the navigable waters of the Middle Level system. The Commissioners have also certain conservation duties to fulfil when undertaking their functions.

The Middle Level Commissioners consist of representatives from both the agricultural and non-agricultural sectors. Occupiers of agricultural property receive a rate demand direct from the Commissioners.

The "rates" on non-agricultural properties, such as houses and factories, are paid through a special levy issued to the district councils within the Commissioners' area. These councils, Fenland DC, Huntingdonshire DC and the BCKLWN are, therefore, able to appoint representatives as Commissioners in respect of the payment made in relation to these properties.

The Middle Level Commissioners are responsible for 120 miles of major watercourses, 100 miles of which are statutory navigations.

All of the Middle Level area is dependent on artificial pumped drainage to evacuate excess rainfall.

Internal Drainage Boards (IDB)

An **Internal Drainage Board (IDB)** is a local public authority that manages water levels. They are an integral part of managing flood risk and land drainage within areas of special drainage need in England and Wales.

Each IDB has permissive powers to undertake work to provide water level management within their Internal Drainage District (IDD), undertaking works to reduce flood risk to people and property and manage water levels for local needs. Much of their work involves the maintenance of rivers, drainage channels, outfalls and pumping stations, facilitating drainage of new developments and advising on planning applications. They also have statutory duties with regard to the environment and recreation when exercising their permissive powers.

IDBs input into the planning system by facilitating the drainage of new and existing developments within their districts, and advising on planning applications.

However, neither the MLC nor IDBs are statutory consultees in the planning application process.

IDBs conduct their work in accordance with a number of general environmental duties and promote the ecological wellbeing of their districts. They have a specific duty to further the conservation and enhancement of all designated environmental sites within their districts such as SSSIs.

Some IDBs may also have other duties, powers and responsibilities under specific legislation. For instance the MLC are also a navigation authority.