

Examination of Kings Lynn and West Norfolk Local Plan – Site Allocations and Development Management Policies

Hearing Statement lodged in respect of **Issue 2**: The Development Management Policies DM.1 to DM.22

Statement submitted on behalf of Camland (563)

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1.0 INTRODUCTION

- 1.1 This Statement is submitted in response to Question 2.16 as published within the Inspector's Issues and Questions Document published in June 2015.
- 1.2 Camland Developments do not consider that the Council's approach to areas at risk from flooding, as set out within the Site Allocations and Development Management Policies DPD (SADMP), is justified. This is because the SADMP is seeking to allocate an increasing number of housing sites that are located within high flood risk areas within the centre of King's Lynn whilst the effective and best use of land located within low flood risk areas on the edge of the town is not being made. This approach is, in its current form, considered to be in conflict with the NPPF and the Adopted Core Strategy.

2.0 THE SEQUENTIAL TEST

- 2.1 The National Planning Policy Framework (NPPF) offers clear advice in respect of the requirement to apply the sequential test. Paragraph 100 of the NPPF is clear in stating that the provision of inappropriate development within areas at risk from flooding should be avoided. Paragraph 101 confirms that development sites should not be allocated if there are reasonable alternative sites available for the proposed development in areas that have a lower probability of flooding.
- 2.2 As we have set out within our corresponding representations lodged in respect of the Pre-Submission SADMP, and as detailed within our Hearing Statement lodged in respect of Issue 3, the SADMP is seeking to constrain development at Knights Hill. Knights Hill is an urban expansion site identified within the Adopted Core Strategy that is located fully within Flood Zone 1. Through the adoption of a housing number limit and a suppressed density target, growth at Knights Hill is currently being restricted to "around 600 dwellings", (see Policy E.4.1 of the SADMP).
- 2.3 As set out within the corresponding representations, the Council's density target of "around 16dph" fails to make efficient use of land at Knights Hill. The resultant housing target of around 600 dwellings is, as a result, approximately 100 dwellings lower than that required to deliver sustainable growth. The SADMP has not set out why additional growth cannot be delivered on the Knights Hill site. In our supporting Hearing Statement lodged in respect of issues 3 we have however set out why more growth than the assumed 600 units can and should be accommodated at Knights Hill. With this being the case the SADMP, as currently drafted, is not as far as is reasonable possible locating growth to where the risks posed by flooding are at their lowest.
- 2.4 The Council approach to flood risk as set out within Policy DM21 is not therefore considered to be justified as the sequential test has not been adequately applied to the proposed allocation sites. It is fully accepted that some growth will be directed towards the

central areas of King's Lynn that are at risk from flooding. Indeed, the Adopted Core Strategy specifically allows for this to occur. To be able to satisfy the sequential test through the allocations process and therefore allow the sequential test requirements to be overridden at the planning application stage (as is proposed), it must however be demonstrated that the efficient use of all available flood zone 1 sites have first been made. This is not currently the case with the SADMP not allowing for the efficient use of the unconstrained Knights Hill site to be made.

- 2.5 Camland Developments are therefore of the view that Policy E4.1 Knights Hill should be amended to allow for "around 700 dwellings" to be provided on the identified site. If, as a result of this amendment, flood zone 1 sites are shown to be delivering efficient and sustainable developments, Policy DM21 would be regarded as being in compliance with paragraph 101 of the NPPF and therefore sound.

3.0 CONCLUSION

- 3.1 Camland Developments do not consider that the Council's approach to coastal flood risk and to other areas at risk from flooding is justified. Efficient use of a sites identified within Flood 1, namely Knights Hill, are not been made and as such the SADMP is not adequately directing growth towards areas that are not at risk from flooding.
- 3.2 Camland Developments consider that if the unjustified housing restrictions that are being imposed at Knights Hill are revised then the Council's approach to flood risk can accord with the NPPF (paragraph 100) and policy CS8 of the Adopted Core Strategy.
- 3.3 The amendments considered necessary to ensure the SDMP is sound are:
- To increase the development target of unconstrained sites on the edge of Kings Lynn, namely Knights Hill, to ensure efficient use of land can be made, before high flood risk areas are promoted for growth.