



Programme Officer Clare Cobley
King's Lynn & West Norfolk BC
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Chapel Street
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Date: 26 June 2015

Dear Clare Cobley

King's Lynn and West Norfolk Local Plan: Site Allocations and Development Management Policies (SADMP)

Thank you for your email received 4th June notifying us of the examination of the above Local Plan. We apologise for the late response.

We previously submitted written representations, on 23rd February 2015, during the public consultation on the proposed Local Plan (Site Allocations and Development Management Policies Pre-Submission Document). We considered the pre-submission SADMP to be legally compliant and sound. Our response provided information with respect to flood risk at several of the proposed site allocations as well as comment on proposed policies DM21 (Sites in Areas of Flood Risk) and DM18 (Coastal Flood Risk Hazard Zone).

We consider that the information and comment provided within our previous written representation remains appropriate but wish to provide a response to question 2.16 posed by the Planning Inspector:

'2.16: Is the Council's approach to coastal flood risk and to other areas at risk from flooding, justified (policies DM 18 and DM 21)? What is the status of the Protocol in Appendix 4, which is referred to as a Local Plan Policy in paragraph C.18.5 but is not mentioned in the section entitled 'Sites in Areas of Flood Risk'?'

Our response to question 2.16 is detailed below:

DM18 (Coastal Flood Risk Hazard Zone)

The area along the east Wash coast between Wolferton Creek and Hunstanton has been demonstrated to be at high risk of flooding from tides and storm events.

As well as the very high flood risk to this area of coastline, identified by the Borough Council of King's Lynn and West Norfolk (BC KLWN) Strategic Flood Risk Assessment, our Flood Zone maps and our Tidal Hazard Mapping, there are also uncertainties over the future of the flood defences between Wolferton Creek and Hunstanton.

The Wash Shoreline Management Plan (SMP) proposes major alterations to the management of coastal flooding and defences. The current intent of the SMP is to maintain the front line 'shingle ridge' defence up until 2025. However, this is subject to continued government funding and also assumes that no irreparable damage is caused as a result of a storm tide event.

Discussions are in progress regarding alternative third party sources of funding. Until the alternative funding mechanism is in place, the annual maintenance of the shingle ridge may cease and the standard of protection it offers may decrease over time. This has the potential to significantly increase flood risk to the area and to reduce the operational lifetime of the development located within it.

Accordingly, the current and predicted future level of protection offered by the sea defences at this location are not to the standard appropriate for tidal and coastal flooding for us to recommend support of proposals for new dwellings and mobile homes/ caravans and other vulnerable development at this location.

As a result of this situation, the BC KLWN, in partnership with us, created a coastal flood risk planning protocol, in September 2010, that sets out the key planning requirements for development in this area, to ensure any new development or redevelopment reduces the risks of flooding in this area.

The coastal flood risk planning protocol has worked well to help prevent inappropriate development in this high flood risk area and as a proactive strategy for the management of development, in order to minimise the current and predicted increased future flood risk to lives and property.

The coastal flood risk planning protocol, which is available to view on the BC KLWN [website](#), has also helped to inform potential planning applicants and interested parties, as to the controls on development, as well as the reasons for them.

Proposed policy DM18 (Coastal Flood Risk Hazard Zone) seeks to formalise the status of the coastal flood risk planning protocol as planning policy. Accordingly, we have no objection to policy DM18 and consider that the Council's approach to coastal flood risk as set out within policy DM18 is justified.

DM21 (Sites in Areas of Flood Risk)

Because much of the Borough is at risk of flooding and the high number of small sites that this plan seeks to allocate we agree with BC KLWN that it is not practical for a site specific flood risk assessment to be prepared in advance of the allocation of each site. This policy allows for flood risk to be appropriately addressed at the point when a planning application is submitted for each site. Accordingly, we have no objection to policy DM21 and consider that the Council's approach to coastal flood risk as set out within policy DM21 is justified.

Strategic Flood Risk Assessment and Tidal River Hazard Mapping Protocol 2012

With respect to the status of the Protocol in Appendix 4 ([Strategic Flood Risk Assessment and Tidal River Hazard Mapping Protocol 2012](#)) the protocol came about because of the variety of different types of flood mapping available for the borough and the need to explain how this mapping should be used when considering

new development. The requirement for the protocol was identified by the BC KLWN and we worked together to produce it. It is our view that the protocol is intended as guidance to planning applicants.

We apologise again for this late response, three hard copies have been posted to the programme officer. We confirm that we do not wish to attend the hearing sessions.

Should you wish to discuss the above matter further please do not hesitate to contact me.

Yours sincerely

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