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Mr Michael Burton Planning Section **Borough Council of King's Lynn & West Norfolk** King's Court Chapel Street King's Lynn Norfolk **PE30 1EX** 

Your Ref: KLWNBC – Updated Local Plan My Ref: FW2022 0688

Date: 18 August 2022 Tel No.: 0344 800 8020

> Email: llfa@norfolk.gov.uk

Dear Mr Burton,

Notice of publication – updated Borough Council of King's Lynn and West Norfolk Local Plan Review Sustainability Appraisal documents for Kings Lynn and West Norfolk

Thank you for your consultation on the above site, received on 8 July 2022. We have briefly reviewed the application as submitted and wish to make the following comments.

In LP25, there is reference to the strengthening of wording around the subject of flood risk management. The LLFA would like to remind the LPA that NPPF now references "all sources of flood risk" and that this will need to be reflected in all updated documents including the SA.

In Appendix 1 Table 2.2 under the Land and Water Resource topic, the LLFA recommends that rainwater collection and reuse should be included in Objective 2. This is top of the discharge hierarchy for the Sewerage Sector Guidance that Anglian Water work to and would strengthen the resilience and sustainability of new developments in the district while helping to better manage flood risk and water resources in a water stressed area.

In relation to Appendix 1 Table 2.2 under the Climate Change and Pollution topic, there is now a clear mandate in NPPF (Chapter 14) to manage flood risk as a requirement. The LLFA request that Objective 11 is strengthened to "must" rather than the current "should".

In Appendix 1 Table 2.2 under the Healthy Communities topic, the LLFA request the inclusion of the specific mention of SuDS or sustainable drainage systems in Objective 14.

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In Table 3.3b the colour coding applied to the matrix is not clear to the LLFA. Please can you include definitions of the colour coding next to the table? In addition, row 14 in the table should include some consideration under the flood risk column.

The LLFA notes that there are a large number of typo and formatting errors within both documents and would anticipate that these would be corrected prior to finalising the documents.

Should you have any queries please contact the LLFA at <a href="mailto:llfa@norfolk.gov.uk">llfa@norfolk.gov.uk</a>.

Yours sincerely,

Sarah

Sarah Luff

## Strategic Flood Risk Planning Officer

## **Lead Local Flood Authority**

## Disclaimer

We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue.