



TECHNICAL NOTE 1

DATE:	07 March 2024	CONFIDENTIALITY:	Public
SUBJECT:	Additional Matters, Issues and Questions (MIQ) for the Examination: Response to AQ25		
PROJECT:	Examination of the King's Lynn & West Norfolk Local Plan Review 2016-2036	AUTHOR:	Simon King
CHECKED:	Matthew Quinnell & Katherine Waters	APPROVED:	Matthew Quinnell

INTRODUCTION

WSP has been appointed by the Borough Council of King's Lynn and West Norfolk (the 'Council') to provide technical support in relation to the independent examination of the Council's Local Plan Review 2016-2036 with respect to flood risk and surface water drainage.

In advance of the Hearing, the Planning Inspectors issued the Matters, Issues and Questions (MIQs) for the Examination¹ to be considered during the Hearing, of which AQ25 relates to the Preliminary Flood Risk Assessment and Surface Water Drainage Strategy² prepared by WSP, stating:

'AQ25 - Do the suggested MMs to Parts A and B of Policy E2.1, set out in the Topic Paper, adequately reflect the recommendations of the Flood Risk Assessment and Surface Water Drainage Strategy (April 2023) for the WWGA [F51g], and representations of the statutory consultees, including Anglian Water and the Lead Local Flood Authority, to ensure that future phases of development will be effective and consistent with national policy in the sustainable management of flood risk?'

FLOOD RISK ASSESSMENT AND SURFACE WATER DRAINAGE STRATEGY

Paragraph 93 of the West Winch Growth Area (WWGA) Topic Paper³ (the 'Topic Paper') restates the recommendations given in Section 8.2 of the Preliminary Flood Risk Assessment and Surface Water Drainage Strategy. The recommendations were made to ensure that the expansion of the WWGA can be sustainably delivered in accordance with the requirements of national policy with respect to flood risk and surface water drainage.

The proposed MMs to Parts A and B of Policy E2.1 do not directly represent each of the proposed recommendations stated in the Topic Paper. However, the proposed MMs to Part A Criterion 15 state that the surface water drainage strategy for the WWGA is to be '*developed in accordance with the Conceptual Surface Water Drainage Strategy and in consultation with the LLFA*'.

The proposed MMs to Part A Criterion 15 appear to conflate the management of surface water runoff generated by the WWGA (i.e. surface water drainage) with the management of surface water runoff generated off-site (i.e. overland flood risk). The management of overland flood risk should be addressed through spatial planning by ensuring that existing flow-paths are incorporated in the layout of the WWGA rather than through the delivery of the drainage strategy as stated in the MMs.

¹ Karen L Baker DipTP MA DipMP MRTPI and Mike Hayden BSc (Hons) DipTP MRTPI (February 2024) *Document G24: Additional Matters, Issues and Questions (MIQ) for the Examination*

² WSP (April 2023) 70071439-FRA: *Preliminary Flood Risk Assessment and Surface Water Drainage Strategy*

³ Borough Council of King's Lynn and West Norfolk (April 2023) *West Winch Growth Area (WWGA) Topic Paper*



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REPRESENTATIONS

LEAD LOCAL FLOOD AUTHORITY

The representations of the Lead Local Flood Authority (LLFA), given in full in Document J42, include three recommended amendments to the proposed MMs to Policy E2.1 as given in Paragraph 94 of the Topic Paper.

The proposed amendments are focussed on ensuring that access to all existing waterbodies within the WWGA is retained to facilitate maintenance by the LLFA, ensuring the provision of multifunctional Sustainable Drainage (SuDS) features in accordance with current best practice guidance, and ensuring that opportunities for the reduction of flood risk to the existing community through the delivery of the WWGA are sought.

The Council's response and the proposed changes to Policy E2.1 following the representations of the LLFA are given by Document J6 to be '*Noted*' and '*No Change*' respectively.

ANGLIAN WATER

The representations of Anglian Water, given in full in Document J9, focus on the anticipated impacts of climate change on water resources and the opportunities for reducing demand through water reuse linked to the development of the surface water drainage strategy for the WWGA. Whilst this does not directly relate to the sustainable delivery of the WWGA with respect to flood risk and surface water drainage, it is included here for completeness.

The Council's response and the proposed changes to Policy E2.1 following the representations of the LLFA are stated in Document J6 to be '*Supporting representation noted*' and '*N/A*' respectively.

CONCLUSIONS AND RECOMMENDATIONS

WSP does not consider that the suggested MMs to Policy E2.1 proposed in the Topic Paper adequately reflect the recommendations made in the Preliminary Flood Risk Assessment and Surface Water Drainage Strategy or the subsequent representations of the LLFA and Anglian Water.

It is recommended that the reference made in the proposed MMs to Part A Criterion 15 to the Conceptual Surface Water Drainage Strategy drawing, which forms Appendix D.2 of the Preliminary Flood Risk Assessment and Surface Water Drainage Strategy report, should be amended to refer to the Preliminary Flood Risk Assessment and Surface Water Drainage Strategy report in its entirety to ensure that all of the recommendations made in Section 8.2 of the report are directly linked to Policy E2.1.



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In addition, it is recommended that the requested inclusion of an additional criterion to Policy E2.1 that would ensure the retention of access to all existing waterbodies within the WWGA to facilitate maintenance is made to reflect the representations of the LLFA, and that further consideration should be given to the other recommended amendments to Policy E2.1 made by the LLFA and Anglian Water in their representations.