

Environment Agency Consultation Comments Paper

All comments made throughout the local plan review document by the Environment Agency have been collated and responded to under the appropriate headings in the table below.

Policy Number/Title	Environment Agency Consultation comment on the LPR Consultation 2019	Modification	Officer Response / Proposed Action
Key sustainability issues	<p>2.2.1 Details We are pleased to see that flood risk is acknowledged throughout the document as a key factor in decision making.</p> <p>2.2.3 Details This is a positive inclusion, although it could be reworded.</p>	<p>Modification for 2.2.3</p> <p>Bullet point 2 must read as follows: “Much of the borough is low-lying, meaning that it is at risk of flooding. Coastal locations are particularly at risk.</p>	Noted.
Key sustainability issues	<p>2.2.3 Details We welcome the sustainability issues (environment) which will be considered in determining the future of the borough flood risk</p>	<p>Modification The Plan should give consideration to the impact of water quality (including wastewater infrastructure) on</p>	Noted we will make the changes.

	<ul style="list-style-type: none"> • climate change • water resources • the need to protect and enhance the environment • promotion of the use of brownfield land <p>The Plan appears to have considered opportunities that will help to ensure that future development is conserving and enhancing habitats to improve the biodiversity value of the immediate and surrounding area.</p>	<p>future development. Where relevant, individual developments should aim to protect and improve water quality including rivers, streams and lakes, to help implement the objectives of the Anglian River Basin Management Plan.</p>	
	<p>3.1.2- Paragraph 3.1.2 provides a list of themes considered, we welcome bullet point 10, 'Recognising the importance of future challenges of climate change, including flood risk'. This is a positive inclusion, although it should go further than simply 'recognising' the importance.</p> <p>There could also be reference to the present levels of risk. Flooding risk is not only an impact of climate change. The area is currently at high levels of risk which is managed through an extensive system of flood defence infrastructure. There is a current</p>	<p>Recommend removing the word 'mitigated' in the sentence below. 'The risk of both tidal and fluvial flooding has been reduced or mitigated through the provision of effective defences and the design of new developments in lower lying areas'.</p> <p>There are different priorities for Rural Areas, Coastal Areas and King's Lynn; it would be beneficial to have similar statements in each to reflect the individual situations. For example, Downham Market could focus on surface water</p>	<p>Local Plan is not the vehicle to address future maintenance issues. The LPR recognises the need to avoid undue future risks for new development. Climate change is seen as the wider issue, encompassing flood risk.</p> <p>Accept deleting the word 'mitigated' Whilst the Local Plan must take into account the various types of flood risk in the LPR</p>

	<p>challenge in maintaining the standard of protection.</p> <p>3.1.4- Bullet point 3. Does climate change fit in this paragraph? The sustainability appraisal separated climate change and flood risk due to the current levels of risk posing a significant constraint – this should be reflected in this vision. Under Places (Coastal Areas) it is stated: ‘The threats of coastal erosion and flooding have been reduced or mitigated in a sensitive and sustainable manner, working with local communities. This is a positive inclusion into the plan.</p>	<p>flooding, Kings Lynn could focus on regeneration and breach risk.</p>	<p>(through locational decisions based on the SFRA, the aspiration in the Objectives is to set out a broad approach. Detailed assessments will come later.</p>
<p>LP01 Spatial Strategy</p>	<p>4.1- Add additional text to bullet point b (i)</p> <p>Bullet Point 2e. states: ‘Protect and enhance the heritage, cultural and environmental assets and seek to avoid areas at risk of flooding’</p> <p>Bullet Point 3f, is a positive and realistic statement. There are specific challenges with regeneration sites and there needs to be a careful</p>	<p>4.1- Add wording: without placing assets at risk of flooding. Care is needed when promoting an extended season in this area. There are safe and sustainable ways to achieve this but it should not promote the intensification of existing developments in the neighbouring villages i.e. Heacham and Snettisham</p> <p>2e- Given that flood risk is</p>	<p>This additional text is not required in that other policies deal with detail implementation of development, so as to avoid flood risk e.g. LP15 / 22. No proposed actions</p> <p>2e- As above.</p> <p>Noted 3f.</p>

	<p>balance between the need to redevelop a site and flood risk management. We are happy to work with the LPA to determine how to best manage strategic regeneration sites within the borough.</p> <p>4.1.18- Windfall applications are not included in the overall housing count, there will be additional flexibility in applying the sequential test. Currently there is no position on when windfall development will be refused on sequential test grounds where the risk is not fluvial or tidal.</p> <p>Is there a specific flood risk strategy to put in place for King's Lynn?</p> <p>Policy 3b - We welcome the significant emphasis placed on brownfield redevelopment within the towns and villages. Please note that some brownfield sites may have high biodiversity or geological value; lie within flood risk or sensitive groundwater areas; or be subject to other environmental risks such as historic land contamination. Therefore, developers must have regard to the NPPF</p>	<p>unavoidable in some areas, this bullet point needs to be expanded? e.g. If areas of flood risk are unavoidable, development will be designed in a manner to ensure it will be safe for its lifetime.</p> <p>4.1.23- Clear guidance will be needed for the neighbourhood plans on flood risk planning, including the sequential and exception test. The Environment Agency is willing to work with the Council to support the neighbourhood plans development.</p>	<p>4.1.18- All applications for development in flood risk areas will need to satisfy the relevant policies. E.g. LP22.</p> <p>There is no specific strategy, but the precise locational issues are covered as part of the SFRA.</p> <p>4.1.23- All neighbourhood plans (as appropriate) will need to respect our strategic policies (including flood risk policies) in order to meet the Basic Conditions for NP examination.</p> <p>3b- Noted, individual site requirements will need to be addressed as they arise. No change.</p>
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	<p>policies on the protection and enhancement of the natural environment and consider the environmental impacts of their proposed development along with the scope to mitigate any impacts.</p>		
<p>LP01 Spatial Strategy</p>	<p>Consider adding a statement to encourage developers to ensure that there is sufficient wastewater infrastructure capacity to accommodate any future development</p>		<p>LP01 is a 'strategic' policy. LP05 adequately covers the requirement to appropriate infrastructure. No change</p>
<p>LP05 Implementation Policy (4 separate comments)</p>	<ul style="list-style-type: none"> • Infrastructure Provision Focus- Consider including FCRM for the Fens (Phase 1) under point 4. • Infrastructure Provision- Both SuDS and flood management infrastructure are listed under point 3, which are positive inclusions. 	<ul style="list-style-type: none"> • Para 4.5.9– Modification- There are opportunities to add flood risk management strategies onto the list in paragraph 4.5.9 such as: FCRM for the Fens (phase 1) and the Surface Water Management Plan. • Modification- Consider adding IDBs and Anglian Water. Additionally, partner organisations may be able to provide actual mitigation measures as well as 	<p>Support noted under point 3</p> <p>Agreed. Flooding should be added to the list under point 4 and this change has been made</p> <p>The intention in 4.5.7 is to show future action is needed to keep pace with new development. The complex nature of the issue means that we can flag the issue, but actual solutions will evolve.</p>

		funding.	Add reference to the projects highlighted. Add text to para 4.5.9 has been made.
LP08 Touring and Permanent Holiday Sites	Under Location Requirements, point e), the Plan states: the site is not within the coastal change management area indicated on the Policies Map, or within areas identified as flood zone 3 in the Borough Council's Strategic Flood Risk Assessment. Although small, there may be areas shown to be within the Tidal Hazard Mapping (THM) extent that fall outside of Flood Zone 3	Modification- 3. Sentence could be reworded to include reference to THM extent.	Agreed- change to the text has been made under 1e
LP14 Coastal Areas (2 comments)	Bullet point 2d: Even the retention of the defences would not provide justification for the relaxation of the policy. Improvement of the defences would still place the new development reliant on the existing defences. We do not recommend the inclusion of "or promote the retention and/or improvement of local sea defences." 6.1.3 – Details- A definition of 'high	2d Modification- Remove the wording "or promote the retention and/or improvement of local sea defences." 6.1.3. Modification- Some clarification of what the minimum that any mitigation measures must achieve would be beneficial. The statement is a sequential/exception test position and should be reflected in the	Agree remove wording as requested by Environment Agency. Wording has been removed for 2d 6.1.3. - Agree include a definition of 'high risk' and clarification of the minimum that any mitigation measures must achieve and reflect this in

	<p>risk' would be beneficial. This could be reference to Flood Zone 3, areas shown to flood to a certain depth in the THM etc.</p>	<p>flood risk policy.</p>	<p>the flood risk policy LP22.</p>
<p>LP15 - Coastal Change Management Area (Hunstanton to Dersingham)</p>	<p>6.2.6 – The required standard of protection from tidal flood risk, as stipulated in the National Planning Practice Guidance is one in 200 years (0.5% annual probability). This sentence isn't very relevant. Areas must be protected to this standard to be classed as an Area Benefitting from Defences in the EA Flood Map, but this point is not relevant for the sequential test. The point to make here is that, although there are defences in place, the standard of protection they offer is low so there remains a significant risk of them being overtopped and/or breached within the lifetime of the development.</p>		<p>Agree – amend wording by deleting this sentence and replacing it with the suggested text.</p>
<p>LP15 - Coastal Change Management Area (Hunstanton to</p>	<p>1. Extensions- Ideally this should also restrict extensions that encroach towards the</p>	<p>1. EA subsequently clarified that this may catch a lot things that they would not</p>	<p>1. Agree 2. Agree amend</p>

<p>Dersingham)</p> <p>(9 comments)</p>	<p>defences</p> <p>2. Replacement Caravans - 3. Replacement of existing permitted caravans will be permitted. Should there be an aspiration to improve the resiliency of the caravans through extensions?</p> <p>3. Use of 'should' in policy wording; change to 'must'.</p> <p>4. Replacement Dwellings - Should there be a condition on all applications that remove the permitted development rights as there is a concern that even minor development near the flood defences could pose a risk to them?</p> <p>5. New developments- (1) The following developments will not be permitted within Tidal Flood Zone 3 (including climate change) as designated on the Strategic Flood Risk Assessment (SFRA) Maps. There is a mismatch between the terminology used within the local plan and the</p>	<p>be concerned with so it could be worded something like this:</p> <p>“Extensions that encroach within 16m of the toe of the flood defences will not be permitted.” 16m reflects the Environmental Permitting Regulations requirements for tidal defences. EA are trying to catch those extensions that will further hinder access to the defences.</p> <p>5. . EA subsequently clarified that with the updated sea level allowances released in December 2019, the current mapping of the flood risk along the coast (and along the Tidal River) contains a greater level of uncertainty. Without commissioning an update of the Wash Flood Modelling and the Tidal Hazard Mapping, the only way to account for this uncertainty will be to require applicants to submit an assessment of their tidal flood risk. This will require a broader definition of the area covered by LP15 to include a buffer around the current flood zones/THM extents.</p>	<p>wording to encourage improved resilience/resistance in replacement caravans.</p> <p>3. Agree</p> <p>4. Disagree – this is unnecessary as the area is subject to an Article IV direction removing these rights. We could however reference this in the supporting text.</p> <p>5. Agree – amend policy wording as suggested.</p> <p>6. Agree update para 6.2.2 as suggested</p> <p>7. Agree - include reference to UKCIP in para. 6.2.5.</p>
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	<p>SFRA. Flood Zone 3 is not referenced as 'Tidal Flood Zone 3' on the SFRA mapping.</p> <p>6. Paragraph 6.2.2 needs to be updated or deleted.</p> <p>7. Para 6.2.5 - UK Climate Impacts Programme (UKCIP) may be a more relevant reference or an additional reference here - UK Climate Impacts Programme (UKCIP) may be a more relevant reference or an additional reference here.</p>	<p>Some rough wording: "This policy applies within the area identified as being at risk of flooding during a 1 in 200 AEP event, now and in the future, either directly or through the failure of the coastal flood defences. An indicative area is illustrated within the Coastal Change Management Area on the Policies Map".</p> <p>8. Replacement Dwellings - 2 d. reword the bullet point, "the dwelling will incorporate flood mitigation and resiliency ..." Modification - Rephrase to: "the dwelling will incorporate resistance and resilience measures...."</p> <p>9. The Coastal Flood Risk Hazard Zone shouldn't be limited to this map, rather it should be a specific flood event scenario. Modification- The area could be the outline for the 0.5% AEP</p>	<p>8. Agree</p> <p>9. The policy wording has been amended in line with the EA's subsequent clarifications of the area affected. We can't add the CCMA to the SFRA mapping. This was completed and published in November 2018.</p>
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<p>LP16 Design and Sustainable Development</p>	<p>We welcome LP16 2a, however, it will be very difficult for the developers of individual developments to provide sufficient evidence to satisfy this requirement – particularly as the largest potential environmental risk is likely to be associated with a water company WRC discharge remote from the site boundary. There is no specific mention of wastewater infrastructure requirements and/or the importance of ensuring that new development does not result in a breach of environmental legislation due to the increased polluting load from</p>	<p>Modification We suggest that there should be a more specific policy requirement: to demonstrate that there is, or will be, sufficient wastewater infrastructure capacity to accommodate each individual development. This would likely take the form of a Pre-Development Enquiry response from Anglian Water submitted in support of each new planning application.</p>	<p>Agree incorporate in policy and supporting text- this has been done.</p>

	wastewater treatment works serving those developments.		
LP16 - Design and Sustainable Development Policy	6.3.19- This should be bookmarked for removal prior to submission to the inspectorate. A document that has not been produced (Level 2 SFRA) cannot steer a document that has been produced (Local Plan).		Disagree – the draft Level 2 SFRA was available when the document was produced. The final Level 2 SFRA was published in July 2019.
LP17 Environmental Assets	We support this policy; it complies with the Defra 25 Year Plan. the policy supports the net gain approach which aims to leave the natural environment in a better state through the development process, by restoring or creating environmental features that are of greater value to both people and wildlife.		Welcome the support.
LP18 Environmental Design and Amenity	We support this policy which states that proposals will be assessed against a number of factors including contamination, water quality and sustainable drainage.		noted
LP20 Green Infrastructure	We welcome this Policy which takes into the NPPF and Defra 25 Year	Modification We recommend that the Plan should encourage	Agree- this has been done.

	Plan. It also promotes cross boundary working, this helps to ensure that strategic priorities across local boundaries are properly co-ordinated.	developers to have regard to the Anglian River Basin Management Plan where relevant.	
LP22: Sites in Areas of Flood Risk	Strategic Policy More detail is required under point 1a. to make reference to detailed requirements of flood risk assessments (FRA).	Modification Consider rewording to: 'A site-specific FRA that considers flood risk from all sources and demonstrates that the proposed development will be safe for its lifetime without increasing flood risk elsewhere and, where possible, reducing flood risk overall. The FRA will need to consider: <ul style="list-style-type: none"> • Climate change in line with allowances detailed in the latest national guidance. • The vulnerability of the users of the proposed development. • Safe access and egress to an area of safe refuge in line with the Flood Risk Assessment Guidance for New Development (FD2320) document'. 	Agree – amended wording.
LP22: Sites in Areas of Flood Risk	There is no reference to the sequential test. The first	Modification Consider rewording to:	Agree this change has been made.

	<p>consideration appears to be applying the exception test without assessing whether development could be located in areas at lower risk of flooding.</p> <p>This also only makes reference to Flood Zones 2 and 3. There may be areas within the THM outlines that are outside FZs 2 and 3. The design guidance relates solely to the exception test. The flood risk policy should consider the sequential test first. Given the complexity of flood risk within the borough, a policy position which clarifies the NPPF position would be beneficial.</p>	<p>'Where sites are at risk of flooding as identified by the Council's SFRA or more recent Environment Agency mapping, and there are no other reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'.</p>	
<p>LP22 - Sites in Areas of Flood Risk Policy</p>	<p>6.9.2 - ...The new SFRA for the Borough was finalised in November 2018. A Level 2 SFRA will also be completed early in 2019. These documents form the basis of the Borough's approach to the Sequential and Exception tests and inform the Sustainability Appraisal of the plan.</p> <p>Some commentary on the outputs from the SFRA would be beneficial – e.g. SFRA indicates risk of flooding in areas by establishing flood zones.</p>	<p>Modification- If sites are already allocated in the plan in advance of the outputs of the Level 2 SFRA how has it been demonstrated that the sites represent sustainable development from a flood risk perspective?</p>	<p>The draft Level 2 SFRA was available to the Council when sites were being considered. It was published in its final form in July 2019.</p>

	When will the Level 2 SFRA be available?		
LP22: Sites in Areas of Flood Risk	<p>6.9.4- the wording regarding opportunities to reduce existing risk of flooding is positive, but some comment to state that the development must not increase the risk of flooding within the development site or in the surrounding area is needed to strengthen the point. Some wording to state that it will need to be demonstrated that development will be resistant and resilient to flooding for its lifetime is required. An assessment of access and egress is also needed.</p> <p>Comment regarding consideration of the impact of climate change is needed. This should state explicitly that climate change allowances considered must be in accordance with the latest national guidance.</p> <p>There is potentially a large amount of information to be covered here and it may be more appropriate to split into bullet point sections for clarity.</p>		Agree – amend wording accordingly.

<p>9.2 Kings Lynn</p>	<p>The order that details of policies are included makes the plan somewhat difficult to read. For example, for the King's Lynn policies, the first map shows locations of allocations E1.4, 1.6, 1.7 and 1.9. From here, a detailed description of E1.4 is included, followed by E1.5 before the location of E1.5 is shown on a map (this is provided later in the document). Although this makes sense in line with the numbering (i.e. 1.4, 1.5, 1.6 etc.)</p>	<p>Modification- it would be easier to have details of all allocations in one location and then move on to the next set of allocations in another location. Alternatively, a more detailed site plan could be provided with each allocation policy description.</p>	<p>All of the King's Lynn allocations are shown on Inset E1 page 152. use of the interactive version of the plan is encouraged.</p>
<p>9.2.1 : E1.1 King's Lynn - Town Centre Policy</p>	<p>There is no reference to requirements for a FRA despite the fact that a number of these sites are at risk of flooding.</p>	<p>Modification- Where it is stated that particular development types are encouraged, include caveat that these must be in line with Policy LP22</p>	<p>Agree include reference to Policy LP22 Sites in Areas of Flood Risk in Policy E1.1 King's Lynn Town Centre.</p>
<p>E1.4 King's Lynn - Marsh Lane</p>	<p>We welcome reference to submission of a site-specific FRA. However, there is inconsistency throughout the plan regarding the amount of detail in wording specifying a requirement for an FRA</p>	<p>Modification FRA requirements must be in line with Policy LP22.</p>	<p>Noted</p>

<p>E1.5 King's Lynn - Boal Quay</p>	<p>The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site. Consideration should be given to potential opportunities to improve the condition and standard of protection of flood defences bordering the site in line with relevant climate change flood levels.</p>	<p>Modification</p> <p>Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'</p>	<p>Agree – wording has been included: 'This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.' in Policy E1.5 2.</p>
<p>E1.10 King's Lynn - North of Wisbech Road</p>	<p>The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site.</p>	<p>Modification - Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'</p>	<p>Agree - Included wording at E1.10 point 1: 'This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'</p>
<p>E1.14 West Lynn - West of St Peter's Road</p>	<p>This site is shown to flood to depths of over 2 metres on the Environment Agency THM. Has any consideration been given to residual risk when applying the sequential test for this site? Provide evidence of sequential test application. Specific consideration will need to be</p>	<p>Modification</p> <p>Include wording: The FRA must consider the residual flood risk to the site in the event of breaching and/or overtopping of the tidal River Ouse. Where possible, a sequential approach should be adopted regarding the layout of</p>	<p>Agree - Included wording: This must consider the residual flood risk to the site in the event of breaching and/or overtopping of the tidal River Ouse. Where possible, a sequential approach should be</p>

	<p>given to the design of the properties and layout of the site to account for the significant depth of flooding. Careful consideration will need to be given to the design and layout of the development to ensure that it is in line with the flood risk design guidance.</p>	<p>the site, with the most vulnerable development situated in areas at lowest risk of flooding (i.e. shallower flood depths).</p>	<p>adopted regarding the layout of the site, with the most vulnerable development situated in areas at lowest risk of flooding (i.e. shallower flood depths).</p>
<p>E1.15 West Lynn - Land at Bankside</p>	<ul style="list-style-type: none"> • 'Submission of a site-specific FRA' is duplicated in the policy wording (points 2 & 7) • The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site. 	<p>Modification- Remove duplication</p> <p>Modification - Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'</p>	<p>Agree – deleted duplicated point 7.</p> <p>Agree - Included wording: 'This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'</p>
<p>10.5 Wisbech Fringes (inc.Walsoken)</p>	<p>10.5.7 - ...the village is constrained, and this is in the low to medium risk (category 2). Wording should refer to Flood Zones throughout for consistency and clarity.</p>	<p>Modification Reword to: Only a small part of the built area of the village is constrained by flood risk, with this are being at medium risk of flooding (Flood Zone 2).</p>	<p>Agree – amended wording of 10.5.7 as suggested.</p>
<p>E3.1 - Hall Lane, South</p>	<p>1.e. ...To include public open space for recreation and visual amenity on</p>		<p>Noted</p>

Wootton	the western side of the site in an area not suitable for housing by virtue of flood risk. It is good to see that a sequential approach regarding site layout has been adopted for this site.		
F1.2 - Land off St. John's Way, Downham Market	10.2.2.4 states that the proposed development type (less vulnerable) is compatible with the flood risk classification.	Modification Whilst this is correct, an FRA is still required for the development and this should be specified here	Noted and agreed.
F1.3 - Downham Market North-East: Land east of Lynn Road in vicinity of Bridle Lane	10.2.3.8 – The site is at little risk of flooding (Zone 1).	Modification Reword to: The site is in Flood Zone 1 and is therefore at low risk of fluvial or tidal flooding.	Noted and agreed change has been made.
F3.1 Wisbech Fringe - Land east of Wisbech (west of Burrettgate Road)	Map included is of poor resolution so it is not possible to determine location/layout of the site.	Modification Provide an additional map with clearer resolution.	Agree- will produce a clearer map at the next stage
G25.1 Clenchwarton - Land between Wildfields Road and Hall Road	This site is shown to flood to depths over 1 metre and up to 2 metres in places on EA THM.	Modification Include wording: The FRA must consider the residual flood risk to the site in the event of breaching	Whilst the EA THM has been superseded by the BCKLWN SFRA 2019, the modification proposed is remains valid. The site

		<p>and/or overtopping of the tidal River Ouse. Where possible, a sequential approach should be adopted regarding the layout of the site, with the most vulnerable development situated in areas at lowest risk of flooding (i.e. shallower flood depths).</p>	<p>benefits from both outline planning permission (15/01315/OM) and reserved matters (19/00913/RMM) for 10 dwellings (granted 08/10/2019). Indeed, a number of conditions have since been discharged. As part of the planning process the EA were satisfied with the flood risk assessment submitted subject to conditions. It is proposed to add the EA's suggested text to the policy clause relating to flood risk and the requirement for a site-specific flood risk assessment for completeness. This amounts to a minor change as it simply adds extra detail.</p>
<p>G35.1 - Feltwell - Land to the rear of Chocolate Cottage, 24 Oak Street Policy</p>	<p>The site is at risk of flooding (partially within Flood Zones 2 and 3) but there is no reference to the requirement for a FRA.</p>	<p>Modification Include wording to state that an FRA is required.</p>	<p>The site has been through the local plan process and was found sound. The Inspector recommended modifying</p>

			<p>the plan to include all of this site as adopted. As part of that process a site-specific flood risk assessment was shared with the EA and as the Inspectors report states the EA concluded they had no objection to the larger site being allocated. In light of the EA's comments it is proposed to update the supporting text as above and include the EA's wording also. The Policy should also be amended to include the flood risk clause to the policy for completeness.</p> <p>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</p>
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			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)
G92.1 Ten Mile Bank - Land off Church Road	The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site.	Modification Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'	Policy G92.1 Land off Church Road was allocated by the SADMP (2016) and has since come forward for planning permission (15/00222/O and 17/01646/RM) for 3 dwellings and has been completed. Accordingly, the allocation has been removed from the plan and has been included within the development boundary
			The site has already been

<p>G93.1 Terrington St. Clement - Land at Church Bank, Chapel Road</p>	<p>12.19.1.5 – ‘In line with the sequential test, the site is located in a lower flood risk area compared to other higher flood risk sites in the settlement. The appropriate flood mitigation measures are required by the allocation policy above.’ Clarify how this conclusion has been reached. The site is entirely within Flood Zone 3 and in an area shown to flood on EA THM.</p>		<p>through the Local Plan process, it is allocated having been found ‘sound’. It now benefits from outline planning permission (17/01649/OM) and reserved matters (19/01589/RMM) has also been approved (27/01/2020). It is proposed to updated this text: All of Terrington St. Clement is located within Flood Zone 3 according to the BCKLWN SFRA2019, therefore there are no sites located within a lower risk flood zone. and update the position with regards to site progress as above.</p>
<p>G93.2 - Terrington St. Clement - Land Adjacent King William Close Policy</p>	<p>Site Description and Justification - There is no detail in this section to demonstrate how flood risk has been considered.</p>	<p>Modification The site is within Flood Zone 3 and therefore justification for allocating the site should be provided. Demonstrate how the sequential test has been carried out</p>	<p>Update text: All of Terrington St Clement is located within Flood Zone 3, therefore there are no available sites located within a lower risk flood zone. The site has already been through the Local Plan process, it is</p>

			allocated having been found 'sound'. It now benefits from full planning permission (17/01450/FM). Indeed the site is currently under construction with 12 of 17 dwellings permitted complete (28/08/2019)
G94.2 Terrington St John, St John's Highway and Tilney St Lawrence - Land north of St. John's Road	12.20.2.3 – '...The site is subject to medium flood risk (FZ2).' SFRA mapping suggests that this site is within Flood Zone 3. Please clarify.		Site has been removed from the LPR.
G109.1 Walpole St. Peter - Land south of Walnut Road	The policy wording and justification makes no reference to flood risk. Given that the site is within Flood Zone 3 on the SFRA mapping, can you please demonstrate how flood risk will be considered and how has the ST been applied?		Noted- the text has been amended in the policy wording and supporting text to make reference to the site being within Flood Zone 3 and how it will be considered. The site has already been through the Local Plan process, it is allocated having been found 'sound'. It now benefits from a reserved matters

			app (18/01573/RM) and is awaiting decision for a full planning application (20/00068/FM) for a total of 19 dwellings.
G109.2 Walpole St. Peter - Land south of Church Road	the policy wording and justification makes no reference to flood risk. Given that the site is within Flood Zone 3 on the SFRA mapping, how will flood risk be considered and how has the ST been applied?		<p>Noted- the text has been amended in the policy wording and supporting text to make reference to the site being within Flood Zone 3 and how it will be considered.</p> <p>The site has already been through the Local Plan process, it is allocated having been found 'sound'. It now benefits from a reserved matters app (18/01472/RMM), the development has commenced and 6 of the 10 dwellings have been completed.</p>
TSC1 – Terrington St	12.19.4.7 - Can residual risk (EA		EA raise no objection to the planning application

<p>Clement Land south of Northgate Way and west of Benn's Lane</p>	<p>THM) be considered in the application of the ST so that a site that floods to shallower depths is allocated?</p>		<p>(18/00940/OM). Site allocation will be carried out in accordance with the BCKLWN SFRA 2019 & The EA / BCKLWN Protocol for Sites at risk to flooding. Policy and text contain relevant flooding clauses/information. Update supporting text accordingly. As above plus: Terrington St Clement is wholly located within Flood Zone 3, therefore there are no sites available within a lower flood risk zone. The site is located within a sustainable settlement which is a KRSC, it is centrally located and is classed as previously developed land.</p>
<p>B: Flood risk design</p>	<p>B.0.7 – Reference to use of resilience measures. B.0.7 – reference to use of dam boards or flood doors.</p>	<ul style="list-style-type: none"> • Modification Reword to state that resilience measures need to be to the full height of flood water. 	<p>This was copied from the EA design guide- this text will be changed. The latest version will be referenced via web link</p>

	<p>Raising finished floor levels (FFLs) to the full height of flood water must always be the first priority as it is the most effective and sustainable means of preventing flood water from entering a property. Dam boards/flood doors should only be used in exceptional circumstances where raising FFLs is not possible.</p> <p>B.0.13 – ‘...using dam boards to keep a building dry with two or more metres of water around it would probably, due to hydrostatic pressures, lead to its structural failure...’</p> <p>This sentence is misleading. It suggests that dam boards can be used to prevent flood water entry for depths of up to 2 metres. In reality dams boards are only effective for flood water depths of up to 600mm as there is a significant risk of structural damage is there is a water level difference between the outside and the inside of a buildings of ~600mm or more.</p>		<p>on our website- when this is completed.</p>
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