

<b>Parish:</b>	<b>King's Lynn</b>	
<b>Proposal:</b>	<b>RETROSPECTIVE- Use of former store building as one bedroom dwelling</b>	
<b>Location:</b>	<b>12 Kitchener Street King's Lynn Norfolk PE30 5BJ</b>	
<b>Applicant:</b>	<b>Mr D Hall</b>	
<b>Case No:</b>	<b>26/00382/F (Full Application)</b>	
<b>Case Officer:</b>	<b>Mrs C Dorgan</b>	<b>Date for Determination: 4 May 2026 Extension of Time Expiry Date: 4 June 2026</b>

**Reason for Referral to Planning Committee** – Application called in by Cllr Joyce

**Neighbourhood Plan:** No

### **Case Summary**

The application seeks retrospective consent for the conversion of a store building to a modest one bedroom dwelling at 12 Kitchener Street in King's Lynn.

The application site lies within the development boundary for King's Lynn, in the area known as South Lynn. The site is also within Flood Zones 2 and 3, and within the Tidal Breach Hazard Zone.

### **Key Issues**

Principle of Development  
Form and Character  
Flood Risk  
Neighbour and Residential Amenity  
Highways/ Access  
Climate Change  
Other material considerations

### **Recommendation:**

**REFUSE**

## **THE APPLICATION**

The application seeks retrospective consent for the conversion of a store building to a single dwelling at 12 Kitchener Street in King's Lynn.

The building has a pitch height of 6.3m and an eaves height of 3.1m. It is physically attached to No.14 Kitchener Street and appears as an end terrace. The conversion of the building includes a living room to the front of the dwelling with an open plan kitchen to the rear, alongside a small shower room accessed off the kitchen. Stairs lead from the sitting room up to a bedroom with a store cupboard. The bedroom is within the roof space and there are two rooflights serving the room.

The total internal habitable space within the dwelling is 41.5 square metres, at a minimum height of 2.3m from finished floor level.

The cross section demonstrates that at ground floor the ceiling height is 2.3m from the finished floor level. The finished floor level at first floor is measured at 2.6m above the ground floor finished floor level.

In terms of the site, the frontage of the dwelling is directly onto the footpath and to the rear of the dwelling is a small yard area shared with no.14. The submitted plans show no.14 and no.12 are within the same ownership. There is no off street parking but residents of Kitchener Street are expected to park on the highway.

The application site lies within the development boundary for King's Lynn, in the area known as South Lynn. The site is also within Flood Zones 2 and 3, and within the Tidal Breach Hazard Zone.

## **SUPPORTING CASE**

The Agent has submitted a supporting case summarised below:

In preparing the planning application documents, we were very much aware of what the minimum housing standards are, as updated Jan. 2026, and are equally aware that this is an important issue in providing acceptable living accommodation, especially in the case of supplying single occupancy, low cost housing within highly sustainable, high density areas of housing, as is the case in this instance. In our opinion the building is neither one nor two storey, but one and a half storey. The unit is proposed as a 1 bedroomed, one person unit. Head height throughout 75% of the floor space has been achieved ( 28sq.m. at ground floor level plus 11.1 sq.m. at first floor level = 38.69 sq.m) at 2.3m. As such the area of habitable floor space at a head height of 2.3m is greater than 75% of the total floor space. The remaining floor area which has a head height of less than 2.3m provides a significant amount of storage space.

Regarding the comments from the Environment Agency, on the issue of means of escape in the event of a catastrophic flood event, the submitted drawings clearly show roof lights at first floor level above the highest predicted flood level (1 in 200 year event). Said roof lights also serve as fire escape routes in accordance with building regulations. Similarly, the submitted planning statement makes direct reference to means of escape. It is acknowledged that the site is within a "high risk" flooding in the event of breach of existing flood defences. It is equally acknowledged that the entire area is a "high risk", being located in an area of high density housing, where extensions to existing dwellings are readily

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approved with no "policing" of how said extensions are used - i.e. providing bedrooms at ground floor level. I fully appreciate that planning policies exist for very good reasons, but there comes a point where common sense seems to be not a valid "planning issue" ? Moving on to the issue of potential structural damage to the building in the event, such a suggestion is based entirely on supposition and can only be considered as being rather alarmist. No evidence to suggest that the existing building would fail; structurally in event of catastrophic failure of flood defences, and my understanding from previous experience is that the EA does not have the in-house technical capability to assess the structural stability of the existing structure.

The EA has confirmed that the issue of escape routes is a matter for the LPAs emergency planner to consider. It is of note that the LPAs emergency planner has raised no objection. The fact that a safe place of refuge exists at a higher even than the "catastrophic event" flood level is mitigation, as is the fact that the submitted FRA confirms that the applicant will sign up for flood warnings systems. For the EA to claim that there have been no mitigation measures put forward is clearly not true. The EA still suggests that the building might not be structurally sound in the event of the forthcoming "catastrophic event" - our supposition supported by no evidence. It is interesting to note that so many other applications are submitted and approved without a requirement for structural assessments, including those applications for housing for the Borough Council.

## **PLANNING HISTORY**

24/00526/F: Application Permitted: 10/05/24 - Replace part pitched/ part flat roof with pitched roof. - 14 Kitchener Street, King's Lynn

## **RESPONSE TO CONSULTATION**

**Highways Authority: NO OBJECTION.**

Having examined the submitted information, in terms of highway considerations for the adopted road network, we have no objection to the principle of the application.

**Environment Agency: OBJECTION.**

Flood Risk

Our Flood Map for Planning shows the site lies within tidal Flood Zone 3a, defined by the 'Planning Practice Guidance: Flood Risk and Coastal Change' as having a high probability of flooding. The proposal is for change of use of a store building to one bedroom dwelling, which is classified as a 'more vulnerable' development, as defined in Annex 3: Flood Vulnerability classification of the National Planning Policy Framework.

Reasons for Objection

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change section of the Planning Practice Guidance (PPG) and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

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- Demonstrate that adequate flood risk mitigation measures will be included in the design of the proposed development to ensure the development will be safe for its lifetime.
- Demonstrate that the proposed development is in line with the Flood Risk Design Guidance and policy LP25 of the Kings Lynn and West Norfolk Local Plan 2021-2040.

### Overcoming our Objection

In this location, our tidal hazard mapping indicates that the dwelling would be at risk during a breach of River Great Ouse defences. The modelling indicates a maximum breach flood depth of 2.3 m, with velocities of 0.3 m/s - 1 m/s, therefore resulting in a maximum hazard rating of 'danger for most'.

Given that the proposal changes the flood risk vulnerability and introduces a new residential use within an area of residual flood depth exceeding 2m, we consider that the scheme should be assessed against the King's Lynn and West Norfolk Flood Risk Design Guidance. This states that for water depths of over 2 m, no ground floor habitable accommodation should be provided, including sitting rooms, dining rooms, and kitchens. The proposed dwelling introduces these elements and therefore puts an increased number of people at risk in an already densely populated area.

The flood risk assessment does not discuss safe access/egress, but mentions that a safe refuge will be available above the maximum predicted flood depth on the first floor. However, it is worth noting that the inundation of the ground floor of the building by floodwater could damage the building fabric and lead to structural problems.

No other mitigation measures have been proposed to ensure that the development will be safe for its lifetime.

Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. We therefore do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out this type of role /responsibility during a flood.

Planning practice guidance (PPG) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise LPAs to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to 'Flood risk emergency plans for new development' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 181 of the NPPF and the guiding principles of the PPG.

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above. The FRA must demonstrate that the development will be safe for its lifetime and will not increase flood risk elsewhere. If this cannot be achieved, we are likely to maintain our objection.

An appropriate FRA is an essential requirement for making an informed decision. An FRA should sufficiently identify and assess the risks of all forms of flooding to and from the proposed development and should demonstrate how flood risks will be managed, taking climate change into account. This application should not be approved without a sufficient understanding of the risk.

Our objection will be maintained until an adequate FRA has been submitted.

**Internal Drainage Board: NO COMMENTS.**

Having screened the application, the proposed development lies outside the internal drainage district of King's Lynn IDB and is classed as minor development, therefore in line with our Planning and Byelaw Strategy it does not meet our threshold for commenting.

**Environmental Health & Housing - Environmental Quality: NO OBJECTION.**

The applicant has provided a screening assessment stating the site has previously been used as a storage space for a central heating installer and indicating no known contamination. We have reviewed our files and the site is on land first seen developed in historic maps dated 1891-1912. The surrounding landscape is largely residential. No significant potential sources of contamination are identified in our records, or in the information provided by the applicant. We have no objection regarding contaminated land.

**Emergency Planner: NO OBJECTION.**

Because of its location in an area at risk of flooding I would suggest that the occupiers if they have not already:

-Should sign up to the Environment Agency flood warning system (0345 988 1188 or [www.gov.uk/flood](http://www.gov.uk/flood) )

- A flood evacuation plan should be prepared (more details at [www.gov.uk/flood](http://www.gov.uk/flood) ):

- This will include actions to take on receipt of the different warning levels.
- Evacuation procedures eg isolating services and taking valuables etc
- Evacuation routes

**REPRESENTATIONS**

None received.

**KING'S LYNN AND WEST NORFOLK LOCAL PLAN 2021-2040**

**LP01** - Spatial Strategy and Settlement Hierarchy Policy (Strategic Policy)

**LP02** - Residential Development on Windfall Sites (Strategic Policy)

**LP06** - Climate Change (Strategic Policy)

**LP14** - Parking Provision in New Development

**LP18** - Design & Sustainable Development (Strategic Policy)

**LP21** - Environment, Design and Amenity (Strategic Policy)

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## LP25 - Sites in Areas of Flood Risk (Strategic Policy)

### NATIONAL GUIDANCE

National Planning Policy Framework (NPPF)  
Planning Practice Guidance (PPG)  
National Design Guide 2021

### PLANNING CONSIDERATIONS

#### The main considerations are:

Principle of Development  
Form and Character  
Flood Risk  
Neighbour and Residential Amenity  
Highways/ Access  
Climate Change  
Other material considerations

#### Principle of Development:

The NPPF states that planning decisions should 'd) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)' (paragraph 125).

The Local Plan, in Policy LP02, states that 'residential development within the development boundaries of settlements in Tiers 1-6 of the Settlement Hierarchy ...will be supported, provided it complies with other relevant policies in the development plan, and meets the specified criteria.'

The application site lies within the development boundary for King's Lynn in an area known as South Lynn. The application seeks retrospective planning consent for the change of use of an existing store building to a modest one bedroom dwelling. In terms of paragraph 125 of the NPPF, the development does utilise an empty storage building.

In terms of Policy LP02, the development is within the development boundary for a tier 1 settlement. In assessing the scheme against the criteria within policy LP02;

- a. the development does result in a development which respects local character, and can be readily assimilated into the settlement. However, given the flood risk issue and quality of accommodation (which are discussed below) it is not considered that the scheme is in accordance with policies LP18 and LP21.
- b. Given the scale of development proposed, housing policies LP28, LP29, LP30 are not relevant to this scheme.
- c. Given the scale of development proposed and the sustainable location, the development would not cause adverse impacts on services and infrastructure, and the local infrastructure is sufficient to accommodate the demands of the development in accordance with Policy LP05.
- d. The conversion of the existing building, with minimal outside space is unable to make a positive contribution to the local environment and landscape setting in accordance with

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environment policies LP06 and LP19. The development does fail to meet the requirements of policy LP06 with regards to climate change and flood risk.

- e. The development does not result in an unacceptable impact on highway safety, or residual, cumulative impacts on the road network which would be severe in accordance with transport Policy LP13.
- f. The development maximises opportunities to reduce the need to travel and encourages sustainable and active travel modes of transport in accordance with Policy LP13.

In summary, while the development does utilise a redundant building, and meets many of the criteria of Policy LP02, the development fails to accord with other Local Plan Policies and as such is contrary to Policy LP02.

### **Form and Character:**

The NPPF sets out in Chapter 12 the need to achieve well-designed places.

Local Plan Policy LP18 requires that development must be of high-quality design. Policy criteria require that development conserves and enhances the environment, responds to the context and character of places by ensuring that the scale, density, layout, materials and access will enhance the quality of the environment, optimise site potential, achieve high standards of sustainable design, and promote and encourage opportunities to achieve high standards of sustainability and energy efficiency.

The development has resulted in minor changes to the external appearance of the existing building in the form of rooflights to the front and rear elevations of the building, which clearly gives the building a more domestic appearance. However, in terms of the appearance of the development, this is not at odds within the locality. The site is surrounded by residential development. In terms of the external appearance of the building and the impact upon the form and character of the locality the development is in accordance with the NPPF and Local Plan Policies LP18 and LP21.

### **Flood Risk:**

The application site lies within Flood Zones 2 and 3, and within the Tidal Breach Hazard Zone. As such the site is at the highest risk of flooding.

The NPPF states in paragraph 170, 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.'

Paragraph 176 goes on to say 'applications for ...changes of use should also not be subject to the sequential test, nor the exception test set out below, but should still meet the requirements for site-specific flood risk assessments.'

Policy LP25 of the Local Plan states that:

'Where sites are at risk of flooding as identified by the Council's Strategic Flood Risk Assessment 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:

1. These will be subject to (and no relevant planning permission will be granted before):

- a. a site-specific flood risk assessment that considers flood risk from all sources and demonstrates that the proposed development will be safe for its lifetime, taking climate change into account, and with regard to the vulnerability of its users, without increasing flood risk elsewhere and, where possible, reducing flood risk overall. The flood risk assessment will need to consider:
    - i. Climate change in line with allowances detailed in the latest national guidance.
    - ii. The vulnerability of the users of the proposed development.
    - iii. Safe access and egress to an area of safe refuge in line with the Flood Risk Assessment Guidance for New Development (FD2320) document.
  - b. satisfactory demonstration that any design or development features necessary to address flood risk issues are compatible with heritage assets in the vicinity (including conservation areas and listed buildings), local visual amenity and (where relevant) to ensure the protection of internationally and nationally designated sites in addition to other natural environment assets such as the landscape and scenic beauty of the National Landscapes....
4. All new dwellings should incorporate flood resilient/ resistant construction/ design measures, in accordance with the Flood Risk Design Guidance (Appendix B)...
6. Mitigation measures must minimise the risk of flooding on the development site and within the surrounding area.'

While the application site lies within flood zones 2 and 3, the application is for the change of use of an existing building from a store into an independent dwelling. As such, in line with the NPPF, it is not necessary to undergo the sequential and exceptions test for the proposed development.

The NPPF clearly states that inappropriate development in areas at risk of flooding should be avoided and that where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere including undertaking a site specific flood risk assessment for the development.

Local Plan Policy LP25 also confirms that a site specific flood risk is required. This has been submitted and identifies that the site is in Flood Zone 3 and while the site benefits from defences on the Tidal River Great Ouse and River Nar which provide protection during the 0.5% annual probability (1 in 200 chance each year) event and 1% annual probability (1 in 100 chance each year) fluvial event, there is a residual risk at the site in the event of a tidal breach with a maximum flood depth of 2.3m. The FRA states that the risk is mitigated as the dwelling has two storeys, the first floor is above the flood level, sleeping accommodation is on the first floor; and the resident is able to utilise flood warnings.

Policy LP25 requires that the FRA demonstrates that the proposed development will be safe for its lifetime, taking climate change into account, and with regard to the vulnerability of its users, without increasing flood risk elsewhere and, where possible, reducing flood risk overall. While the measures proposed are acceptable in terms of the visual appearance and impact on the locality, policy LP25 requires that all new dwellings should incorporate flood resilient/ resistant construction/ design measures, in accordance with the Flood Risk Design Guidance (Appendix B).

The Flood Risk Design Guidance states that 'where the FRA shows depths over two metres, no ground floor habitable accommodation should be provided. Habitable accommodation includes bedrooms, sitting rooms, kitchens etc). Rooms not usually used for living in are not considered habitable, such as toilets, storerooms, garages.

The development proposes a living room and kitchen at ground floor which is contrary to the Flood Risk Design Guidance.

The Council has been consistent in its approach, where planning applications do not conform to the Design Guidance these have been refused. The applications have been successfully defended on appeal.

Furthermore, the Environment Agency states that the site specific flood risk assessment (submitted by the applicant) does not discuss safe access/egress, but mentions that a safe refuge will be available above the maximum predicted flood depth on the first floor. However, it is worth noting that the inundation of the ground floor of the building by floodwater could damage the building fabric and lead to structural problems. The EA in their response go on to state that 'no other mitigation measures have been proposed to ensure that the development will be safe for its lifetime.'

The applicant argues that the development includes roof lights at first floor which are higher than the highest predicted flood level, which also provide a means of escape and are compliant with building regulations. They point out that the entire area is at high risk, and extensions to dwellings are granted within this area. In response to the issue of potential structural damage to the building in an event, the applicant states this is alarmist and that there is no evidence to suggest the existing building would fail.

While the applicant states that there are sufficient mitigation measures put forward, the Environment Agency maintain their objection to the development. Their objection states that the scheme fails to:

- Demonstrate that adequate flood risk mitigation measures will be included in the design of the proposed development to ensure the development will be safe for its lifetime.
- Demonstrate that the proposed development is in line with the Flood Risk Design Guidance and policy LP25 of the Kings Lynn and West Norfolk Local Plan 2021-2040.'

As such the development proposed is not safe from a flood risk perspective and fails to accord with the NPPF, and Local Plan Policy LP25.

### **Neighbour and Residential Amenity:**

The NPPF states that decisions should ensure that developments 'create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users...' (paragraph 135)

Local Plan Policy LP18 requires that developments demonstrate 'well-designed homes which provide good standard and quality internal environments for their users, promoting health and well-being, will be encouraged including those which meet the National Described Space Standards.'

Local Plan Policy LP21 requires that proposals are assessed against their impact on neighbouring uses and their occupants as well as the amenity of any future occupiers of the proposed development. Also that development that has a significant adverse impact on the amenity of others or which is of a poor design will be refused.

The application site is currently within the ownership of the adjoining dwelling no.14 and shares the same rear yard. The conversion of the building itself would have a limited impact

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upon the donor dwelling as would not result in overlooking or overshadowing as a result. The shared yard between dwellings is less of a concern while the dwellings are within the same ownership however, if no.12 was then sold as an independent unit this would have implications for the rear yard and for waste storage and collection, and cycle storage.

More significantly however, the development would not provide adequate accommodation for the resident of no.12. The applicant states that the dwelling is 1.5 storeys in height. The Nationally Described Space Standards state that the minimum size for a two storey dwelling is 58 square metres. For a single storey dwelling the floorspace should be a minimum of 39 square metres for a single occupant, and 50 square metres for one bedroom with two bed spaces. The Standards also require a minimum of 75% of the Gross Internal Area of this floorspace to be at a minimum floor to ceiling height of 2.3m. Given the bedroom is at first floor and that the applicant is reliant on the first floor as a place of refuge during a flood event, it is considered that the scheme is more closely aligned with a two storey dwelling. The applicant has identified on the submitted plans that the habitable floorspace of the dwelling is 41.5 square metres. In their email dated 14 April 26, they stated that 38.7 square metres of floor space had a minimum height of 2.3m, which is over 75% of the total floorspace.

In summary, the development fails to provide a quality form of residential accommodation. Firstly, the dwelling falls below the minimum space standards required. Secondly, there is inadequate amenity space provided for an independent dwelling. If this unit were to be sold on, there would be no outside space for waste storage or cycle parking. As such the scheme is contrary to the NPPF and Local Plan Policies LP18 and LP21.

### **Highways/ Access:**

The NPPF states that new development should prioritise sustainable transport modes, achieve safe and suitable access to the site and ensure the transport elements (design of streets, parking areas, etc) reflect current national guidance. Paragraph 116 states that 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network...would be severe...'

Local Plan Policy LP13 requires development proposals should demonstrate that schemes will reduce the need to travel, promote sustainable forms of transport and provide for safe and convenient access for all modes.

LP14 sets out parking requirements for new development. In this case 1 car parking space should be provided for the one bedroom unit and one secure and covered cycle space. However, the policy goes on to state that reductions in car parking requirements may be considered where it can be shown that the location and the availability of a range of sustainable transport links ... is likely to lead to a reduction in car ownership ...

The application site is not of sufficient size to be able to provide an off-road car parking space. However, this is the case for all dwellings along Kitchener Street, with vehicles parked on the public highway. The site lies within cycling distance of the town centre and on a regular bus route. It is suggested that given the sustainable location, the opportunities for alternative modes of transport and the fact that parking on the highway in this location is accepted, that the scheme as proposed is acceptable.

Furthermore, the Local Highway Authority support this stance. Their consultation response reads 'in terms of highway considerations for the adopted road network, we have no objection to the principle of the application.'

There is sufficient space in the rear yard/ garden area to provide secure cycle storage.

The development is in accordance with the NPPF and Local Plan Policies LP13 and LP14.

### **Climate Change:**

Policy LP06 requires that new development should minimise and reduce carbon emissions by measures such as; locating new development in areas to minimise the need to travel, including green infrastructure, minimising and mitigating pollution (during both the construction and operational phases of development), exceeding present thermal energy and high efficiency systems set by Building Regulations, maximising opportunities from solar technologies and retrofitting of existing buildings with measures to reduce energy and heat consumption will be encouraged and supported. In addition, schemes should seek to adapt and mitigate the impacts of climate change by (for example) ensuring new development is designed and adapted to incorporate climate change and flood risk resilience, minimising and mitigating air pollution, and incorporating appropriate water efficiency and water recycling measures.

The application site is in a sustainable location with opportunities for cycling and public transport. In terms of the building itself, it is accepted there are limited opportunities to retrofit measures to reduce energy and heat consumption. However, as stated above, the scheme fails to ensure the 'new development is designed and adapted to incorporate climate change and flood risk resilience and the latest Government guidance regarding the use of climate change allowances in flood risk assessments.' As such the development is also contrary to Local Plan Policy LP06.

### **Other material considerations:**

Drainage – This is a retrospective application, the building is an existing structure and the dwelling has been occupied for approximately seven months. The dwelling is connected to the mains public sewer system. It is considered that the drainage arrangements are satisfactory.

Ecology – The conversion of the building does not result in the loss of habitats and the size of the development means that it is de minimis and exempt from Biodiversity Net Gain requirements. Given the building itself and immediate locality there is little opportunity for ecological enhancements as part of the scheme.

The application site falls within the Impact Risk Zone for European Protected Sites, and as such the applicant is required to submit the GIRAMS HRA and the mitigation sum of £315.58 per unit. The applicant has submitted the HRA and the applicant has paid this amount in full.

Enforcement – The application is a result of an enforcement investigation (ref: 25/00533/UNAUTU) into an unauthorised use.

### **CONCLUSION:**

The application seeks retrospective planning consent for the conversion of a store building into a one bedroom dwelling on Kitchener Street in King's Lynn. The application site lies within an existing residential area in the town of King's Lynn, within the development boundary, and this is considered a sustainable location.

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However, the application site is within Flood Zones 2 and 3, and within a tidal hazard zone. The Environment Agency objects to the scheme on the grounds that the applicant has failed to demonstrate that the flood risk mitigation measures proposed will ensure the development is safe for its lifetime. Furthermore that the development conflicts with the Flood Risk Design Guidance and policy LP25 of the Kings Lynn and West Norfolk Local Plan.

While the form and character of the development proposed is considered acceptable, the development would not provide adequate accommodation for the resident(s) of no.12. The plans demonstrate that the development is below the minimum Nationally Described Space Standards for residential units and the independent dwelling has no amenity space/ outdoor space for bin and cycle storage. Therefore, the scheme fails to provide a quality form of residential accommodation and is contrary to the NPPF and Local Plan Policies LP18 and LP21.

Members are recommended to refuse this application for the reasons detailed above.

**RECOMMENDATION:**

**REFUSE** for the following reason(s):

- 1 The site is located in Flood Zones 2 and 3 and a Tidal Breach area as identified by the Council adopted Strategic Flood Risk Assessment (SFRA) 2018 and Environment Agency's updated flood mapping. There is a residual risk at the site in the event of a tidal breach with a maximum flood depth of 2.3m.

The applicant has failed to demonstrate through an appropriate site-specific Flood Risk Assessment that the proposed development can be made safe for its lifetime, and would be detrimental to the safety of future occupiers and therefore contrary to the NPPF 2025 and LP06, LP18 and LP25 of the Local Plan.

- 2 The proposed dwelling is below the minimum size defined within the nationally described space standards. As such the dwelling fails to provide an adequate quality of living accommodation for the residents and therefore does not comply with paragraph 135 of the NPPF and Policies LP18 and LP21 of the Local Plan.