

Borough Council of
**King's Lynn &
West Norfolk**



**Borough Council of King's Lynn and West Norfolk's
Response to
the Issues and Questions raised by Inspector David
Hogger
in relation to the
King's Lynn and West Norfolk Local Plan:
Site Allocations and Development Management
Policies**

Issue 37: Three Holes (G.96)

**Examination
November 2015**

Table of abbreviations used with the Council's Statements

Abbreviation	Full Wording
AONB	Area of Outstanding Natural Beauty
BCKLWN	Borough Council of King's Lynn and West Norfolk
BDC	Breckland District Council
CLG	Communities and Local Government
CITB	Construction Industry Training Board
CS	Core Strategy
DM	Development Management
DPD	Development Plan Document
EA	Environment Agency
FDC	Fenland District Council
FRA	Flood Risk Assessment
GI	Green Infrastructure
GTANA	Gypsy and Traveller Accommodation Needs Assessment
ha	Hectare
HELAA	Housing and Economic Land Availability Assessment
HLF	Heritage Lottery Fund
HRA	Habitats Regulation Assessment
HSEHA	Health and Safety Executive Hazard Areas
IDB	Internal Drainage Board
KRSC	Key Rural Service Centres
KLATS	King's Lynn Area Transportation Strategy
LDS	Local Development Scheme
LLFA	Lead Local Flood Authority
LPSO	Local Plan Sustainability Objectives
MLC	Middle Level Commissioners
NCC	Norfolk County Council
NE	Natural England
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
NORA	The Nar Ouse Regeneration Area
NWT	Norfolk Wildlife Trust
OAN	Objectively Assessed Need
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
RV	Rural Village
RAF	Royal Air Force
RLA	Residential Land Assessment
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SADMP	Site Allocation and Development Management Policies Plan
SCI	Statement of Community Involvement
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SHMA	Strategic Housing Market Assessment
SHLAA	Strategic Housing Land Availability Assessment
SMP	Shoreline Management Plan
SPA	Special Protection Area
SSF	Site Sustainability Factors
SSSI	Site of Special Scientific Interest
SuD	Sustainable Drainage systems
SVAH	Smaller Villages and Hamlets
SWMP	Surface Water Management Plan
THI	Townscape Heritage Initiative
UPC	Un-attributable Population Change

37.1

Are there any drainage implications of development at Three Holes that cannot be satisfactorily addressed?

1. Drainage Implications

1.1 The Council throughout the SADMP process has sought explanation and clarification on points raised by the MLC. However, this has proved unsuccessful. Most recently on the particular point raised on this site we have asked the MLC to explain why the development cannot connect in to their drain. They have not provided any reason to explain their comment.

1.2 With regard to the proposed allocation in Three Holes, Site G96.1 Three Holes – Land adjacent to 'The Bungalow', Main Road, the agent promoting the site has commented (Appendix 1) that in their opinion, they consider that the site and ground conditions are capable of sustaining surface water drainage through methods that include appropriately designed soakaways. The footprint of the proposed dwellings would be the only areas requiring drainage, external surfaces being capable of utilising permeable surfacing such as gravel.

1.3 The agent is aware that recent developments within the area of similar soil types have been developed successfully and viably without particular issue. The agent concludes, that having taken note of the MLC comments, they are satisfied that there are no drainage implications of the development which cannot be satisfactorily addressed.

1.4 Further to this the agent (Appendix 1) has consulted with water and drainage engineers who detail an anticipated method of drainage. With discharge being restricted to greenfield runoff rate and due to the low density of the development that space is available to accommodate the drainage system.

1.5 The Council's SFRA (Strategic Flood Risk Assessment) identifies Site G96.1 as being constrained by flood risk (Flood Zone 2 & 3), none of the sites proposed in this settlement are at a lower risk of flooding and this is a constraint associated with the whole settlement. The Environment Agency (EA) in their representation (924) state that they have reviewed the proposed allocation and have no objection. The EA's 'Risk of Flooding From Surface Water' maps indicate that Site G96.1 is located within an area of very low risk (Appendix 2). This defines the area as having a chance of flooding of less than 1 in 1000 (0.1%).

1.6 The NCC as LLFA, raised no objection to the site. The SWMP for King's Lynn and West Norfolk Settlements, prepared by the LLFA in consultation with BCKLWN, the EA, Anglian Water and IDBs, does not identify the settlement of Three Holes as an area particularly vulnerable to surface water flooding.

1.7 Having liaised with the Borough Council Development Management Team regarding the IDB comments they are confident there is an acceptable design solution. This has been and is current practice with planning applications in this area.

1.8 It is therefore considered that a satisfactory form of surface water drainage in relation to proposed allocated Site G96.1 is achievable. The detail of the scheme can be developed in consultation with NCC as the LLFA and the MLC at the design process stage that would inform a detailed planning application.

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Appendix 1. Site G96.1 Agent's Comments

From: Ian JM Cable <design@ianjmcable.co.uk> Sent: Fri 26/06/2015 14:14
To: Alex Fradley
Cc:
Subject: RE: Site G96.1 Three Holes

Alex,

Thank you for your e mail. A full technical response may be difficult to provide within the timescale. However, in relation to surface water drainage we consider that the site and ground conditions are capable of sustaining surface water drainage by use of methods including appropriately designed soakaways for example. The footprint of the proposed dwellings would be the only areas requiring drainage, external surfaces being capable of utilising permeable surfacing such as gravel.

So far as I am aware other recent developments within area of similar soil types have been developed with successfully and viably without particular issue. With reference to the density of development, we had previously proposed a lower density of development, however, the borough have suggested the density be increased to 5.

To conclude, taking note of the Middle Level Commissioners comments, we are satisfied that there are no drainage implications of the development which cannot be satisfactorily addressed.

If I am able to provide a further response within the timescale I will respond further. If you require any additional information in the meantime please do not hesitate to contact me.

Regards,

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The King's Lynn & West Norfolk Borough Council's response to the Issues and Questions paper from
Inspector David Hogger

From: Ian JM Cable <design@ianjmcable.co.uk> Sent: Thu 02/07/2015 10:16
To: Alex Fradley
Cc:
Subject: RE: Site G96.1 Three Holes

Alex,

Further to my e mail, our consulting drainage engineers have confirmed that drainage to the site is not considered to be a problem and that attenuated drainage can be accommodated so as not to increase the run off rate from the site. See summary not below if infiltration soakaways alone will not suffice.

I trust this assists in confirming the suitability and deliverability of the site.

Dear Ian

With reference to Site 488: Land at The Bungalow, Three Holes we would anticipate that the drainage system would consist of an unlined attention tank to benefit from any limited infiltration available, this would then outfall to the adjacent field drainage ditch. Discharge into the ditch will be restricted to the greenfield runoff rate to ensure the proposed site does not increase the risk of surface water flooding off-site. Due to the low density of development space is available to accommodate the drainage system

Kind Regards

Matt Hare B.Sc EngTech TMICE
Water and Drainage Engineer

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Regards,

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Appendix 2. The EA's Risk of Flooding from Surface Water Three Holes Map

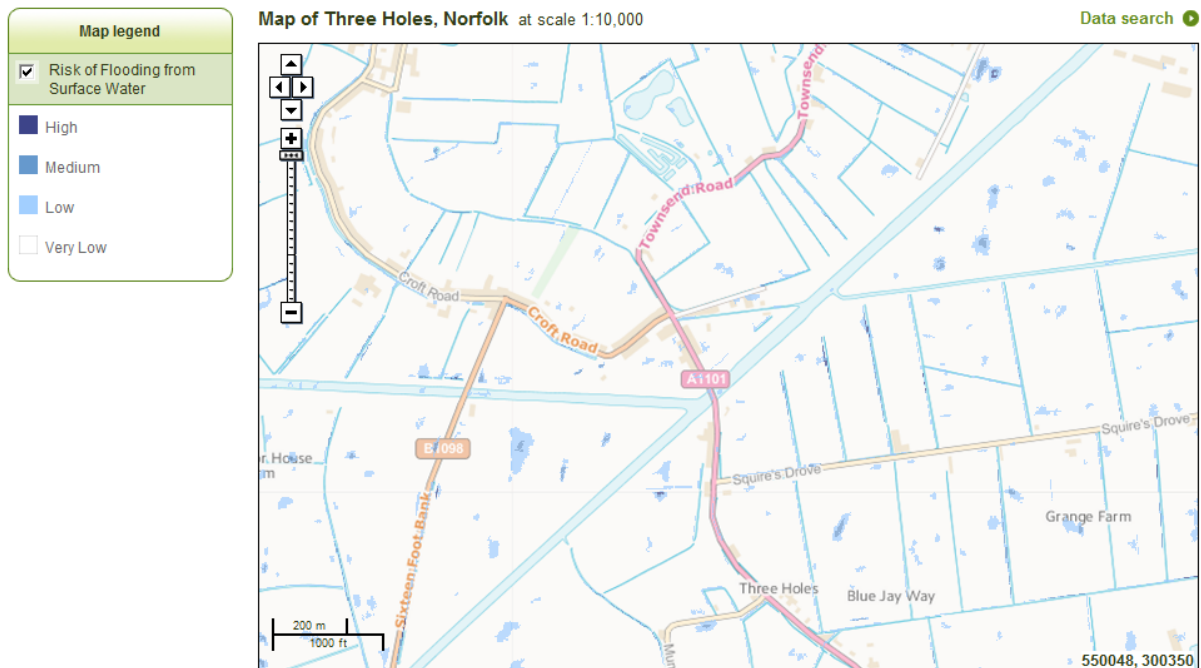
<http://watermaps.environment-agency.gov.uk/wiyby/wiyby.aspx?lang=en&topic=ufmfsw&layer=0&x=550500&y=300500&scale=10&location=Three+Holes%2c+Norfolk#x=550610&y=300383&scale=11>

Risk of Flooding from Surface Water

Surface water flooding happens when rainwater does not drain away through the normal drainage systems or soak into the ground, but lies on or flows over the ground instead.

The shading on the map shows the risk of flooding from surface water in this particular area.

Click on the map for a more detailed explanation.



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The location you have selected is in an area that has a very low chance of flooding from surface water.



What does 'very low' mean?

Very low means that each year, this area has a chance of flooding of less than 1 in 1000 (0.1%).

This type of flooding can be difficult to predict, much more so than river or sea flooding as it is hard to forecast exactly where or how much rain will fall in any storm.

This is based on the best information we have available, such as ground levels and drainage.