

Sandra Homcenko

From: Sandra Homcenko
Sent: 03 September 2024 13:16
To: Sandra Homcenko
Subject: FW: KLWNBC Gypsy and Travellers

From: Annette Feeney
Sent: Tuesday, September 3, 2024 9:11 AM
To: Valera Lvov <Valera.Lvov@West-Norfolk.gov.uk>
Subject: FW: KLWNBC Gypsy and Travellers

Hi Luke,

Please find below our written response.

King's Lynn and West Norfolk Borough Council engaged with us to determine an appropriate methodology for allocating additional plots located within areas with significant flood risk constraints.

This was required as:

- There was deemed a need for additional plots beyond those already allocated,
- The Flood zones are extensive within the Borough due to the Fen landscape.
- The floodplains associated with Coast and Main Rivers are not active due to the presence of flood defence infrastructure. There does remain a residual risk of these failing or being overtopped in time due to the impacts of climate change.

We agreed that the policies within the NPPF, and the FCRM PPG, need to be considered in context with the local situation, rather than being applied directly.

A level 2 Strategic Flood Risk Assessment (SFRA) has been produced to support the allocation of additional plots. This details the proposed methodology, agreed with us, to follow a sequential approach to the allocation of sites within areas of flood risk.

The NPPF does allow for sites at low risk to be discounted where other planning considerations would not allow for them to be allocated. It is not our role to determine whether this process has been carried out appropriately, we just acknowledge that it is a valid practice.

We can confirm that the SFRA has been produced utilising appropriate methodologies, utilising the best available information at the time.

National Policy states that caravans for permanent occupation are a highly vulnerable land use and therefore are not compatible in Flood Zone 2 and 3.

We understand that the sequential approach utilised is a pragmatic approach to manage a housing need in an area heavily constrained by flood risk. Please note however, that we have not determined whether the need for additional plots outweighs the risk of flooding as this is outside of our remit.

It is important to note that this approach is only appropriate when meeting the current need of the borough and should not be utilised to justify additional plots beyond the recognised need.

We trust this advice is useful.

Kind regards

Neve

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