



Norfolk County Council

Norfolk County Council Comments on the: Necton Neighbourhood Plan (Reg 16) 01 December 2023

1. Preface

- 1.1. The officer-level comments below are made without prejudice.
- 1.2. The County Council welcomes the opportunity to comment on the emerging Neighbourhood Plan and recognises the considerable amount of work and effort which has been put into developing the Neighbourhood Plan to date.

2. Children's Services

- 2.1. The County Council reiterates comments made in response to the Reg 14 consultation. As '*great weight*' that should be given '*to the need to create, expand or alter schools through the preparation of plans and decisions on applications*' as detailed in para 95 of the NPPF. The ability to expand, if required, Necton Primary School should not be impeded by neighbourhood plan policies.
- 2.2. The NP proposes a designation for the school playing field as Important Sport and Recreation Facilities (in NP policy NTN10.) The supporting text to this policy explains that the area should be protected by policy ENV4 of the Breckland Local Plan (BLP) (which protects open space areas identified in the BLP adopted in 2019).
- 2.3. The BLP identified two such areas in Necton (the village recreation ground and church yard) but did not include the school playing field.
- 2.4. BLP Policy ENV4 amongst its provisions explains that development that would result in the loss of existing designated open space will only be permitted if:
 - a) it can be demonstrated (through a local assessment) that there is an excess of recreational or amenity open space in the settlement and the proposed loss will not result in a current or likely shortfall during the plan period; or
 - b) recreational facilities within the open space will be enhanced by the proposed development on an appropriate portion of the open space; or
 - c) the community would gain greater benefit from the developer providing a suitable alternative recreational or amenity open space in an equally accessible and convenient location.

- 2.5. Looking at this wording, it may present a policy obstacle to the future expansion of the school, if required, onto the protected playing field area.
- 2.6. Policy NTN10 should include the following text '*except for the expansion of school buildings on the site to deliver education enhancement, in view of the wider social benefit that this would deliver*'. To enable for the expansion of the school, if required.
- 2.7. Should you have any queries with the above comments please contact Paul Harker (Place Planning Manager) [REDACTED].

3. **Natural Environment**

Ecology:

- 3.1. The County Council is reiterating the following suggestions raised during the Reg 14 consultation.
- 3.2. Community Aspiration 1 – Central Village Green:
It is recommended that any proposals for a new village green include provision for enhancing its biodiversity value, for example by using native wildflower seeding and introducing an appropriate maintenance regime, for example carrying out a late summer cut and collection of arisings to allow plants to flower during the summer period.
- 3.3. The inclusion of a pond would be supported, and again it is advised that it is designed to maximise wildlife opportunities, for example by creating shallow margins and planted with suitable native marginal and aquatic species to benefit amphibians and invertebrates.
- 3.4. Community Aspiration 3 – Road Verge & Green Space Improvements:
The planting of trees and bulbs/ wildflowers is broadly supported however, it is advised that the verges are first assessed to establish their existing plant species richness; for example, a relaxation in verge mowing can sometimes reveal the existence of previously unrecorded native plants. Where new planting takes place, the use of native species is advised.
- 3.5. Should you have any queries with the above comments please contact the Natural Environment Team at neti@norfolk.gov.uk.

4. **Historic Environment**

- 4.1. Policy NTN 4 – Local Heritage Assets - neglects to mention buried heritage assets, either known or currently unknown and fails to mention the role of the Norfolk County Council Historic Environment Strategy and Advice Team in advising the local planning authority about the heritage impacts of proposed developments. There are a wealth of buried archaeological monuments within the parish, knowledge of which is constantly expanding, which should be mentioned within the draft neighbourhood plan. We would therefore recommend that the authors:

1. Contact the Norfolk Historic Environment Record (NHER) and request information on designated and undesignated heritage assets within the plan area. The NHER can be contacted at
 2. heritage@norfolk.gov.uk.
 3. Consider the full range of heritage assets within the plan area and identify those they feel are most significant. They may wish to prepare a local list of heritage assets they believe should be protected and enhanced and put this to the community for consideration.
 4. Mention the role of the Norfolk County Council Historic Environment Strategy and Advice Team in advising the local planning authority about the heritage impacts of proposed developments.
- 4.2. Should you have any queries with the above comments please contact Steve Hickling (Historic Environment Officer) at [REDACTED] or call 01362 869285.

5. **Lead Local Flood Authority**

- 5.1. The Lead Local Flood Authority (LLFA) welcome that references are retained in the Regulation 16 Neighbourhood Plan Document and its proposed policies to flooding from various sources including surface water and fluvial (river) sources, the need for flood mitigation to be incorporated into new developments and the potential impacts of climate change upon flood risk and new developments. Of the 11 policies and 11 Community Aspirations proposed, Policy NTN 3: Local Green Spaces, Policy NTN 6: Sustainable Construction Practices and Policy NTN 8: Flooding and Sustainable Development and their supporting text, along with the Landscape Guidance in Appendix 2 and Development Design Checklist found in Appendix 4, are all of relevance to matters for consideration by the LLFA.
- 5.2. The LLFA also welcomes references made to new developments incorporating Sustainable Drainage Systems (SuDS) through the use of features such as rainwater and stormwater harvesting and other natural drainage systems and recognising the wider benefits in achieving the four pillars of SuDS, namely water quality, water quantity, biodiversity, and amenity.
- 5.3. The LLFA further welcome references retained in the Regulation 16 document to the Necton Neighbourhood Plan supporting Strategic Policies which deal with matters relating to flooding, drainage and climate change such as the Breckland Local Plan 2019, Breckland Emerging Local Plan, Norfolk Minerals and Waste Local Plan and the National Planning Policy Framework, noting that the River Wissey flows along the southern boundary of the Parish of Necton in an east-west direction.

- 5.4. Notwithstanding the above comments, the LLFA recommends a full review of flooding be carried out to assess all sources of flood risk within the Parish of Necton, including flood risk from surface water, groundwater, rivers and ordinary watercourses and supported by relevant mapping. The LLFA also advises that guidance from relevant Agencies such as the Environment Agency be adhered to in respect of the impacts of new development upon flood risk and drainage.
- 5.5. The LLFA welcomes reference made in Section 7.20 of the Regulation 16 document to 'Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document' (the most up to date version at the time of adoption should be referred to), with the LLFA wishing to highlight its role in providing guidance when considering surface water risk, flooding and drainage matters for any allocated sites or areas of proposed development. For reference, this document is available from the "Information for developers" section of the Norfolk County Council website.
- 5.6. According to LLFA datasets (extending from 2011 to present day) we have 3 no. records of internal flooding and 7 no. records of external/anecdotal flooding in the Parish of Necton. The LLFA highlight the importance of considering surface water, groundwater and flooding from ordinary watercourses within the Neighbourhood Plan in the best interest of further development in the area. Please note that all external flood events are deemed anecdotal and have not been subject to an investigation by the LLFA.
- 5.7. We advise that Norfolk County Council, as the LLFA for Norfolk, publish completed flood investigation reports [here](#).
- 5.8. The LLFA is not aware of AW DG5 records within the Parish of Necton, however, this will need to be confirmed with/by Anglian Water.
- 5.9. According to Environment Agency datasets, there are areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parish of Necton.
- 5.10. We note this does not include flood risk from surface water or any mapping. We therefore recommend inclusion of surface water flooding maps within the Neighbourhood Plan representative of the entire Neighbourhood Plan area. Information on this and associated tools/reference documents can be found at:
- [GOV.UK - Long Term Flood Information – Online EA Surface Water Flood Map](#)
 - [Norfolk County Council \(NCC\) – Flood and Water Management Policies](#)
 - [Norfolk County Council \(NCC\) – Lead Local Flood Authority \(LLFA\) Statutory Consultee for Planning: Guidance Document](#)

5.11. Should you have any queries with the above comments please contact the Lead Local Flood Authority at llfa@norfolk.gov.uk.