

**Necton Neighbourhood Plan (2023) Reg 16**

**Summary of Comments**

**GENERAL COMMENTS**

- Historic England do not consider it necessary for comment and refers to Regulation 14 stage comments.
- Natural England lacks specific data on protected species and environmental assets. It advises consulting local experts before determining if a Strategic Environmental Assessment (SEA) is needed. If an SEA is required, Natural England must be involved in the process and reserves the right to provide further advice.
- National Highways understands a proposed change of speed limit will have further consultation and no further comment.
- NHS Norfolk and Waveney raises concerns of the expansion of Necton and its impact on local health care facilities and recommends an additional statement.
- The Norfolk County Council (NCC) recommends a way to implement the community aspirations 1 and 3, recommends that heritage assets has further information and to liaise with the Norfolk Historic Environment Record. Additionally, they advise conducting a comprehensive flood risk assessment and reviewing guidance from the Environmental Agency. They also suggest referring to additional guidance and recommends amendments that does not prevent the potential expansion of the school.
- Norfolk Wildlife Trust would like further enhancement of Policy NTN5 and has recommended additional policies.
- Water Management Alliance the site in question lies outside the Internal Drainage District of the Norfolk Rivers Internal Drainage Board as well as the Board's wider watershed catchment, therefore the Board has no comments to make.
- The Gardens Trust (GT) NGT would urge the Council to include policies which, in accord with national planning policies, provide the maximum possible protection both to registered parks and gardens and to sites which are not registered but are nevertheless of significance. Your consultation also asks whether we are aware of important non-designated sites. The Trust's publication "Norfolk Gardens and Designated Landscapes" (2013) includes descriptions of a number of such sites in Breckland.

HE: Historic England (N)

NE: National England

NH: National Highways

NHS: NHS Norfolk & Waveney

NCC: Norfolk County Council

NWT: Norfolk Wildlife Trust

TGT: The Garden Trust

WMA: Water Management Alliance

Breckland District Council			
Reference	Clause	Comment	Suggestion
<b>Housing</b>			
Page 14	<p><b>Policy NTN1</b></p> <p>Housing Growth and Enabling Officer</p>	<p>Policies with the Breckland Plan such as the GEN 03 prioritise new sustainable development to be within the settlement hierarchy including the Local Service Centre Necton and this is to utilise existing infrastructure. The proposal of Policy NTN1 does not include 2 bedroom housing, this therefore conflicts with the overall housing needs of the authority, even if local housing needs in Necton have been met.</p> <p>The policy would be acceptable for schemes meeting only the need of Necton, such as exception sites or similar over-provision.</p> <p>However, there is a very significant need district wide for 2 bed homes, particularly affordable homes. It is reasonable for a service centre village such as Necton to take on some of that district wide need – noted that Necton has already done some heavy lifting in this respect over the past few years.</p> <p>I would therefore suggest that the mix noted be adopted for exception sites and over -provision only. On any site that is expected to meet an element of district need – i.e. any site that comes forward under standard planning policies and has no local connection restriction or similar – this policy should not apply. Given the high level of provision in Necton in recent years, plus the strong evidence base provided, it may be appropriate for a modified policy to apply in these cases, with the housing mix somewhere between the district standard and the Necton evidence</p>	<p><b>Policy NTN1 should be amended to include 2 bed properties in order to reflect that Necton may be required to provide affordable housing to meet the needs of the District as a whole, that is consistent with its role as a Local Service Centre in the Breckland Local Plan.</b></p>

<b>Breckland District Council</b>			
<b>Reference</b>	<b>Clause</b>	<b>Comment</b>	<b>Suggestion</b>
<b>Para 5.17</b>	<b>Page 15</b> Housing Growth and Enabling Officer	<p>It is noted that para 5.17 asserts that no further affordable housing is required in Necton. Again, the point above applies – Necton is not an island, and as a sustainable service centre village it should be expected that some district wide need is met in the village.</p> <p>It is also noted that this point has not been put forward as a policy. Therefore, it is considered that this should be regarded as subservient to the adopted district wide policy, although it is noted the parish will not give support for any schemes such as exception sites in the village, based on this paragraph.</p>	<b>Amend para to reflect that Necton may be required to provide affordable housing to meet the needs of the District as a whole, that is consistent with its role as a Local Service Centre in the Breckland Local Plan.</b>
<b>Natural Environment</b>			
<b>Page 18 and 24</b>	<b>Policy NTN2 and NTN7 Planning</b>	Further evidence to understand the distinctiveness, character and significance of key views within the landscape assessment may allow policy NTN 2 to be more robust. This may also help to clarify policy NTN 7 renewable energy when understanding what a significant adverse impact of renewable energy would have for sensitive viewpoints.	<b>Include further information on understand the distinctiveness, character and significance of key views</b>
<b>Page 19</b>	<b>Policy NTN 3 Land and Development Officer</b>	There is insufficient evidence provided as to why the following areas should be designated as LGS in accordance with the NPPF. This is similar to the position used for the Watton Neighbourhood Plan where the Examiner agreed that the criteria set in the NPPF was not met <sup>1</sup> . These comments reflect those made at Reg 14 stage.	<b>Remove these areas as LGS</b>

<sup>1</sup> [https://www.breckland.gov.uk/media/21186/Watton-Neighbourhood-Plan-Examiner-s-Recommendations/pdf/Watton\\_NP\\_Examiners\\_Report\\_Recommendations\\_-\\_Appendix\\_A.pdf?m=638384960038570000](https://www.breckland.gov.uk/media/21186/Watton-Neighbourhood-Plan-Examiner-s-Recommendations/pdf/Watton_NP_Examiners_Report_Recommendations_-_Appendix_A.pdf?m=638384960038570000)

<b>Breckland District Council</b>			
<b>Reference</b>	<b>Clause</b>	<b>Comment</b>	<b>Suggestion</b>
		<p>Folly View Amenity Space – This area is owned by Breckland District Council. The area has two large trees, but shows no signs of outstanding natural beauty, historical significance and is not a wildlife hotspot. We do not believe it would meet the criteria for LGS designation.</p> <p>Briar Close Amenity Open Space – This area is owned by Breckland District Council. This area is not suitable for recreational use, shows no signs of outstanding natural beauty or historical significance and it is not a wildlife hotspot. The land is used as access to the surrounding properties. We do not believe it would meet the criteria for LGS designation.</p> <p>Elizabeth Drive Amenity Open Space – This area is owned by Breckland District Council. Due to the large number of trees, it is not suitable for recreational sports but could potentially be an area in which wildlife may inhabit. The area does have a public right of way through the middle which suggests it is used by the residents.</p>	
<b>Page 21</b>	Policy NTN4 Historic Buildings Officer	<b>Support this Policy</b>	<b>No further comment.</b>

**Summary of Comments by Other Organisations**

<b>Reference</b>	<b>Clause</b>	<b>Comment</b>	<b>Suggestion</b>
<b>Vision &amp; Objectives</b>			

Reference	Clause	Comment	Suggestion
Page 11	Objectives 3 and 4	NWT: Welcome objectives 3 and 4 in the Neighbourhood Plan to '...minimise the impact of development on the natural environment' and to 'maximise opportunities to improve natural habitats and biodiversity.'	No further comment.
<b>Natural Environment</b>			
Page 19	<u>Community Aspiration 1 – Central Village Green:</u>		<p><b>NCC: (Ecology)</b> 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.</p> <p><b>NCC: (Ecology)</b> 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.</p>
Page 19	<u>Community Aspiration 3 – Road Verge &amp; Green Space Improvements:</u>		<p><b>NCC: (Ecology)</b> 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.</p>

Reference	Clause	Comment	Suggestion
<b>Page 19</b>	Policy NTN3 Local Green Spaces	<b>NWT:</b> We fully support Policy NTN3 and the designation of the 8 Local Green Spaces.	<b>No further comment.</b>
	<b>Community Aspirations 1 , 2 and 3</b>	<b>NWT:</b> We fully support the community aspirations 1, 2 and 3. These initiatives will provide important benefits for wildlife and provide ecological corridors between habitats. In addition to supporting wildlife, tree planting will be particularly beneficial with regards to climate change.	<b>No further comment.</b>
<b>Built Environment</b>			
	Policy NTN 4 – Local Heritage Assets	<b>NCC: (Historic Environment)</b> 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	<b>NCC: (Historic Environment) :</b>  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. <a href="mailto:heritage@norfolk.gov.uk">heritage@norfolk.gov.uk</a> .

Reference	Clause	Comment	Suggestion
		<p>constantly expanding, which should be mentioned within the draft neighbourhood plan</p>	<p>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.</p> <p>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.</p> <p>4.2. Should you have any queries with the above comments please contact Steve Hickling (Historic Environment Officer) at <a href="mailto:steve.hickling@norfolk.gov.uk">steve.hickling@norfolk.gov.uk</a> or call 01362 869285.</p>
<p><b>Page 23</b></p>	<p><b>Policy NTN5 Development Design</b></p>	<p><b>NWT:</b> We particularly support NTN5 but feel this should go further to provide more protection for the natural environment.</p>	<p><b>NWT:</b> We would support the following policy text: ·</p> <p>‘Development proposals should demonstrate that due care has been taken to ensure that any associated pollution from greenhouse gases, dust, noise, litter, vibration, light, odour, waste, chemical or other sources will not have a significant negative impact on the natural environment or the community. Cumulative impacts should also be taken into account.’</p>

Reference	Clause	Comment	Suggestion
Page 25	Policy NTN8 – Flooding and Sustainable Drainage	NTW: We support policy NTN8 regarding the use of SuDS.	No further comment.
<b>Norfolk Wildlife Trust: Recommendations for new Policies</b>			
	<p><b>New Policy Recommendation – ‘Dark Skies’</b></p> <p>We strongly recommend including a policy on ‘Dark Skies’ to protect wildlife. There are 3 County Wildlife Sites within the NP area which support various wildlife species. Light pollution has an overall negative impact on bats and other wildlife, and species are affected in many different and numerous ways. It is imperative for the protection of wildlife that each of these: wildlife roosts, foraging habitat and commuting routes are protected from artificial lighting. Specific reasons for this are given in the best practice guidance as indicated below. We recommend the following wording (or similar) for a new policy on Dark Skies:</p> <ul style="list-style-type: none"> <li>· ‘Development proposals are required to address light spillage and eliminate all unnecessary forms of artificial outdoor lighting.</li> <li>· Development proposals should demonstrate compliance with best practice guidance for avoiding artificial lighting impacts on bats (<a href="https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/">https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/</a>). Where lighting cannot be avoided altogether in proposals then it must be designed to avoid light spill onto wildlife roosts, foraging habitat, and commuting routes for bats, birds, and other species.’</li> </ul>		



Reference	Clause	Comment	Suggestion
		<p>For the benefit of any planning applications making reference to this policy, we recommend that reference to this best practice guidance is included in the plan.</p> <p><b>New Policy Recommendation – ‘Biodiversity and Green Corridors’</b>            There are 3 County Wildlife Sites within the NP area, one of which is also Ancient woodland. Local Wildlife Sites are vital havens where much of our important wildlife lives, including rare species. They act as stepping stones for wildlife across the wider landscape. Therefore it is important that they are afforded as much protection as possible.</p> <p>We strongly recommend including a new policy to enable development to proceed in a way that provides robust protection for the the County Wildlife Sites within the NP area. (This is in addition to the more general protection offered in Local Plan policies.) We recommend including ‘buffer zones’ in the policy wording below as these are designed to protect sensitive landscape patches and areas of high biodiversity. They provide important protection from the impacts of development.</p> <p>The Environment Act 2021 makes a 10% biodiversity net gain mandatory from end of January 2024. The State of Nature report highlights the significant historical losses that have occurred across the UK and safeguarding what remains of our natural heritage is a vital cornerstone in nature’s future recovery. Given the pressures facing biodiversity, we recommend a greater ambition of 20% should be set to provide greater confidence in genuine gains for biodiversity and ensure the successful recovery of nature in Norfolk. Natural England’s biodiversity net gain study (Vivid Economics, June 2018) also found that a biodiversity net gain scenario of up to 20% was not expected to affect the financial viability of housing developments.</p> <p>We therefore recommend the following wording (or similar) for a new policy on ‘Biodiversity and Green Corridors’ (This wording is largely taken from Policy 7 of the Lingwood &amp; Burlingham draft Neighbourhood Plan which provides a good example of such a policy.):            ‘The importance of the area for wildlife will be safeguarded, retained and habitats enhanced through positive action as part of the development process. Where required, a 20% Biodiversity Net Gain (BNG) should be achieved in the following ways:</p> <ul style="list-style-type: none"> <li>· Delivery of BNG on site wherever possible. If it can be demonstrated that this is not feasible, or BNG delivered offsite is demonstrated to be of greater ecological benefit, then delivery elsewhere in the Parish boundary should be explored prior to the use of credits.</li> <li>· Contribute towards enhancing, restoring or maintaining existing green infrastructure such as county wildlife sites, priority habitats or green corridors to those sites.</li> <li>· Development will deliver or extend habitats onsite to mitigate the loss of these valued habitats through fragmentation.</li> <li>· Provide a higher percentage of native species, in comparison to non-native species, in their soft landscaping plan, with all new landscaping schemes designed to achieve clear ecological objectives (provide for pollinators; improve local habitat connectivity; provide missing habitat etc.</li> <li>· Development should incorporate green roofs and green walls as appropriate, including on any new community buildings.</li> </ul>	

Reference	Clause	Comment	Suggestion
	<ul style="list-style-type: none"> <li>· Buffer zones should be implemented around sensitive wildlife sites, including County Wildlife Sites, as appropriate, to minimise development impacts on these sites.'</li> </ul>		
<b>Lead Local Flood Authority (General)</b>			
		<p><b>NCC Lead Local Flood Authority</b> states 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. Welcomes reference of Sudds and 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</p>	<p><b>NCC Lead Local Flood Authority:</b> 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.</p>

Reference	Clause	Comment	Suggestion
		<p>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.</p> <p>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.</p> <p>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.</p> <p>We advise that Norfolk County Council, as the LLFA for Norfolk, publish completed flood investigation reports <a href="#">here</a>.</p> <p>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.</p>	<p>*For reference, this document is available from the "Information for developers" section of the Norfolk County Council website.</p> <p>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.</p>

Reference	Clause	Comment	Suggestion
		<p>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.</p>	<p>Information on this and associated tools/reference documents can be found at:</p> <ul style="list-style-type: none"> <li>• <a href="#">GOV.UK - Long Term Flood Information – Online EA Surface Water Flood Map</a></li> <li>• <a href="#">Norfolk County Council (NCC) – Flood and Water Management Policies</a></li> <li>• <a href="#">Norfolk County Council (NCC) – Lead Local Flood Authority (LLFA) Statutory Consultee for Planning: Guidance Document</a></li> </ul> <p>5.11. Should you have any queries with the above comments please contact the Lead Local Flood Authority at <a href="mailto:llfa@norfolk.gov.uk">llfa@norfolk.gov.uk</a>.</p>
<b>NHS Norfolk &amp; Waveney (General)</b>			
<p>Existing Healthcare Position Proximate to the Proposed Development Plan Area</p>		<p><b>NHS:</b> Expectation that Necton residents will register in branches where capacity data indicates that this practice is close to becoming constrained. Local Primary Care Network capacity issues have potential to arise.</p>	
<p>Review and Assessment of the Proposed</p>	<p>‘Protect and improve the range of existing community facilities and services.’.</p>	<p><b>NHS: 8.6</b> would include sufficient and sustainable healthcare facilities and services. The local plan also contains Policy COM 04 as stated in the draft neighbourhood plan,</p>	<p>The ICS would welcome the addition of a simple statement to confirm that Necton Parish Council will support the ICS in ensuring suitable</p>

Reference	Clause	Comment	Suggestion
Development Plan	Section 8.6, the Neighbourhood Plan has an important role in making sure that there are sufficient and adequate services in the village to meet the needs of current and future resident	<p>which helps to minimise the loss of community facilities and promotes the creation, enhancement and expansion of facilities.</p> <p><b>NHS:</b> There is yet to be 79 additional dwellings and 124 committed through planning permission. This growth is likely to impact on the healthcare services in the area and may require the enhancement and expansion of facilities as stated in the local plan.</p>	<p>and sustainable provision of healthcare services across all health sectors for the residents of Necton through the utilisation of developer contributions as and when planning applications are submitted for the neighbourhood and surrounding area.</p> <p>If unmitigated, the impact of developments on healthcare services in and around the Necton neighbourhood plan area would become unsustainable, including that of Primary care, Community care, Mental health, Acute care and the Ambulance service.</p>
<b>Services and Facilities</b>			
<b>NTN10</b>		<p><b>NCC: (Children Services)</b> 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).</p> <p>NPPF para 95 <i>‘to the need to create, expand or alter schools through the preparation of plans and decisions on applications’</i> . The ability to expand, if required, Necton</p>	<p><b>NCC:</b> Policy NTN10 should include the following text <i>‘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’</i>. To enable for the expansion of the school, if required.</p>

Reference	Clause	Comment	Suggestion
		<p>Primary School should not be impeded by neighbourhood plan policies.</p> <p>. The BLP identified two such areas in Necton (the village recreation ground and church yard) but did not include the school playing field.</p> <p>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:</p> <p>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</p> <p>b) recreational facilities within the open space will be enhanced by the proposed development on an appropriate portion of the open space; or</p> <p>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.</p> <p>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.</p>	



## Full Wider Bodies Response

### Historic England

Dear Sir/Madam,

**Ref: Necton Neighbourhood Plan Regulation 16 Consultation**

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here:

<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us on [eastplanningpolicy@historicengland.org.uk](mailto:eastplanningpolicy@historicengland.org.uk) if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Ross McGivern  
Historic Places Adviser, East of England  
[Ross.mcgivern@HistoricEngland.org.uk](mailto:Ross.mcgivern@HistoricEngland.org.uk)



## National Highways

Thank you for consulting National Highways on the abovementioned Neighbourhood Plan.

National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).

It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly.

We have considered the ongoing works to be completed by National Highways and the proposed change of speed limit which we understand to be subject to further consultation with National Highways and relevant parties. Notwithstanding the above comments, we have reviewed the document and note the details of set out within the draft document are unlikely to have a severe impact on the operation of the trunk road and we offer **No further Comment**.

## Natural England

Dear Sir/Madam

### **Necton Neighbourhood Plan – Regulation 16 Consultation**

Thank you for your consultation on the above dated 20 October 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

### **Natural England does not have any specific comments on this draft neighbourhood plan.**

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#) .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

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Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Sally Wintle

## NHS Norfolk & Waveney

Dear Sir / Madam,

### **Necton Neighbourhood Plan 2023-2036**

#### Introduction

Thank you for consulting the Norfolk and Waveney Integrated Care System (ICS) Strategic Estates workstream on the neighbourhood development plan. The following comments are on behalf of the Norfolk and Waveney ICS, incorporating Norfolk & Waveney Integrated Care Board (ICB), Norfolk Community Health and Care (NCHC), Norfolk & Norwich University Hospital NHS Foundation Trust, Norfolk and Suffolk NHS Foundation Trust and the East of England Ambulance Service NHS Trust (EEAST).

#### Existing Healthcare Position Proximate to the Proposed Development Plan Area

The local Primary Care Network (PCN) that would cover the health needs of Necton residents is the Swaffham and Downham PCN, and is a collaboration between primary, secondary, community, social, voluntary, and mental health care providers to form an integrated health and social care service to patients.

Following a review of the information available I note that, the provision of healthcare services is currently serviced by Plowright Medical Centre, Necton Branch and Manor Farm Medical (Necton Branch); in terms of premises space the demand and capacity data indicates that this practice is close to becoming constrained and the majority of residents within the Necton neighbourhood plan boundary from new developments, will be expected to register and visit a local GP.

In terms of limited premises space, additional PCN roles being hosted by GP practices and with the addition of new developments in and around the area in the near future, capacity issues have potential to arise. The PCN are looking at ways to better integrate the community teams with Primary care provision.

## Review and Assessment of the Proposed Development Plan

One of the objectives listed in the draft neighbourhood plan is to 'Protect and improve the range of existing community facilities and services.' This is further supported in section 8.6 which states that 'the Neighbourhood Plan has an important role in making sure that there are sufficient and adequate services in the village to meet the needs of current and future residents' this would include sufficient and sustainable healthcare facilities and services. The local plan also contains Policy COM 04 as stated in the draft neighbourhood plan, which helps to minimise the loss of community facilities and promotes the creation, enhancement and expansion of facilities.

In terms of housing, there are yet to be 79 additional dwellings identified with 124 committed through planning permissions, some of which may have been developed out already and some that may not yet have started. With those still to start and those awaiting planning permission, there will be a significant proportion of population growth in the area. This growth is likely to impact on the healthcare services in the area and may require the enhancement and expansion of facilities as stated in the local plan.

### **Conclusion**

The ICS would welcome the addition of a simple statement to confirm that Necton Parish Council will support the ICS in ensuring suitable and sustainable provision of healthcare services across all health sectors for the residents of Necton through the utilisation of developer contributions as and when planning applications are submitted for the neighbourhood and surrounding area.

If unmitigated, the impact of developments on healthcare services in and around the Necton neighbourhood plan area would become unsustainable, including that of Primary care, Community care, Mental health, Acute care and the Ambulance service.

If you have any queries or require further information, please do not hesitate to contact the Strategic Estates team.

Yours faithfully,

NHS Norfolk & Waveney - Strategic Estates

## Norfolk County Council



# Norfolk County Council

## Norfolk County Council Comments on the:

### Necton Neighbourhood Plan (Reg 16)

01 December 2023

#### 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.

#### 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) at [paul.harker@norfolk.gov.uk](mailto:paul.harker@norfolk.gov.uk).

## **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:

3.5. Should you have any queries with the above comments please contact the Natural Environment Team at [neti@norfolk.gov.uk](mailto:neti@norfolk.gov.uk).

## **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](mailto: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 [steve.hickling@norfolk.gov.uk](mailto:steve.hickling@norfolk.gov.uk) or call 01362 869285.

### **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](mailto:llfa@norfolk.gov.uk).

## Norfolk Wildlife Trust

### **Necton Neighbourhood Plan (Regulation 16)**

We welcome objectives 3 and 4 in the Neighbourhood Plan to ‘...minimise the impact of development on the natural environment’ and to ‘maximise opportunities to improve natural habitats and biodiversity.’

### **Community Aspirations 1 , 2 and 3**

We fully support the community aspirations 1, 2 and 3. These initiatives will provide important benefits for wildlife and provide ecological corridors between habitats. In addition to supporting wildlife, tree planting will be particularly beneficial with regards to climate change.

### **Policy NTN3 Local Green Spaces**

We fully support Policy NTN3 and the designation of the 8 Local Green Spaces.

### **Policy NTN8 – Flooding and Sustainable Drainage**

We support policy NTN8 regarding the use of SuDS.

### **Policy NTN5 Development Design**

We particularly support NTN5 but feel this should go further to provide more protection for the natural environment. We would support the following policy text:

· ‘Development proposals should demonstrate that due care has been taken to ensure that any associated pollution from greenhouse gases, dust, noise, litter, vibration, light, odour, waste, chemical or other sources will not have a significant negative impact on the natural environment or the community. Cumulative impacts should also be taken into account.’

### **New Policy Recommendation – ‘Dark Skies’**

We strongly recommend including a policy on ‘Dark Skies’ to protect wildlife. There are 3 County Wildlife Sites within the NP area which support various wildlife species. Light pollution has an overall negative impact on bats and other wildlife, and species are affected in many different and numerous ways. It is imperative for the protection of wildlife that each of these: wildlife roosts, foraging habitat and commuting routes are protected from artificial lighting.

Specific reasons for this are given in the best practice guidance as indicated below. We recommend the following wording (or similar) for a new policy on Dark Skies:

- 'Development proposals are required to address light spillage and eliminate all unnecessary forms of artificial outdoor lighting.
- Development proposals should demonstrate compliance with best practice guidance for avoiding artificial lighting impacts on bats (<https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>). Where lighting cannot be avoided altogether in proposals then it must be designed to avoid light spill onto wildlife roosts, foraging habitat, and commuting routes for bats, birds, and other species.'

For the benefit of any planning applications making reference to this policy, we recommend that reference to this best practice guidance is included in the plan.

### **New Policy Recommendation – 'Biodiversity and Green Corridors'**

There are 3 County Wildlife Sites within the NP area, one of which is also Ancient woodland. Local Wildlife Sites are vital havens where much of our important wildlife lives, including rare species. They act as stepping stones for wildlife across the wider landscape. Therefore it is important that they are afforded as much protection as possible.

We strongly recommend including a new policy to enable development to proceed in a way that provides robust protection for the the County Wildlife Sites within the NP area. (This is in addition to the more general protection offered in Local Plan policies.) We recommend including 'buffer zones' in the policy wording below as these are designed to protect sensitive landscape patches and areas of high biodiversity. They provide important protection from the impacts of development.

The Environment Act 2021 makes a 10% biodiversity net gain mandatory from end of January 2024. The State of Nature report highlights the significant historical losses that have occurred across the UK and safeguarding what remains of our natural heritage is a vital cornerstone in nature's future recovery. Given the pressures facing biodiversity, we recommend a greater ambition of 20% should be set to provide greater confidence in genuine gains for biodiversity and ensure the successful recovery of nature in Norfolk. Natural England's biodiversity net gain study (Vivid Economics, June 2018) also found that a biodiversity net gain scenario of up to 20% was not expected to affect the financial viability of housing developments.

We therefore recommend the following wording (or similar) for a new policy on 'Biodiversity and Green Corridors' (This wording is largely taken from Policy 7 of the Lingwood & Burlingham draft Neighbourhood Plan which provides a good example of such a policy.):

'The importance of the area for wildlife will be safeguarded, retained and habitats enhanced through positive action as part of the development process. Where required, a 20% Biodiversity Net Gain (BNG) should be achieved in the following ways:

- Delivery of BNG on site wherever possible. If it can be demonstrated that this is not feasible, or BNG delivered offsite is demonstrated to be of greater ecological benefit, then delivery elsewhere in the Parish boundary should be explored prior to the use of credits.
- Contribute towards enhancing, restoring or maintaining existing green infrastructure such as county wildlife sites, priority habitats or green corridors to those sites.
- Development will deliver or extend habitats onsite to mitigate the loss of these valued habitats through fragmentation.
- Provide a higher percentage of native species, in comparison to non-native species, in their soft landscaping plan, with all new landscaping schemes designed to achieve clear ecological objectives (provide for pollinators; improve local habitat connectivity; provide missing habitat etc.
- Development should incorporate green roofs and green walls as appropriate, including on any new community buildings.
- Buffer zones should be implemented around sensitive wildlife sites, including County Wildlife Sites, as appropriate, to minimise development impacts on these sites.'

Yours sincerely,

Julie Cullis

Assistant Adviser, Planning & Advocacy

## The Garden Trust

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee on planning matters. The Norfolk Gardens Trust (NGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites and other significant sites. It is authorised by the GT to respond on its behalf in respect of such consultations.

NGT would urge the Council to include policies which, in accord with national planning policies, provide the maximum possible protection both to registered parks and gardens and to sites which are not registered but are nevertheless of significance.

Your consultation also asks whether we are aware of important non-designated sites. The Trust's publication "Norfolk Gardens and Designated Landscapes" (2013) includes descriptions of a number of such sites in Breckland. Please let me know if you require a copy. The Trust continues to develop its knowledge base of these sites. Attached is a recently prepared document intended to supplement the information in the 2013 publication.

The Trust intends to further refine this document and I would be happy to provide you with an updated version in due course. Research into significant unregistered sites will be an ongoing process and it would be appropriate for Local Plan policy to allow for additional sites to be included.

Please acknowledge this email.

Regards

Keri Williams  
Planning Adviser  
Norfolk Gardens Trust

## Water Management Alliance

Thank you for your consultation on the above planning application. Having screened the application, the site in question lies outside the Internal Drainage District of the Norfolk Rivers Internal Drainage Board as well as the Board's wider watershed catchment, therefore the Board has no comments to make.