



Norfolk County Council

Norfolk County Council Comments on the: Yaxham Neighbourhood Plan (Reg 16) 06 May 2025

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. Lead Local Flood Authority

- 2.1. The LLFA welcomes that the Yaxham “NP4Yaxham” 2016 - 2036 Adopted May 2017, Updated July 2024 – Examination Version (Regulation 16) and its proposed policies make references to flooding from various sources such as surface water and fluvial flooding and to the implications of climate change on development and flood risk. It is however noted that no references are made within the document to other sources such as groundwater flooding, with no groundwater mapping provided. Policies ENV3: Green Infrastructure and ENV4: Surface Water Management Plans within the Regulation 16 document, are of most relevance to matters for consideration by the LLFA.
- 2.2. As was the case when reviewed at the Regulation 14 stage, whilst the LLFA note that some changes have been proposed to the Neighbourhood Plan for Yaxham and its policies, given the period of time which has elapsed since the adoption of the Yaxham Neighbourhood Plan in 2017, the LLFA advise that policies relating to matters for consideration by the LLFA would benefit from being reviewed and updated where applicable, particularly due to an increasing risk of surface water flooding resulting from climate change and updated guidance.
- 2.3. Furthermore, as previously advised at Regulation 14 stage, whilst the retention of Policy ENV4 relating to surface water management plans which recognises the need for developers to provide effective surface water design and management, along with ensuring development does not cause flood related problems elsewhere within the Parish of Yaxham, is welcomed by the LLFA, it is still considered that this policy / supporting text would benefit from enhancement / updating and referencing the inclusion and benefits of SuDS within developments such as permeable surfacing, rain gardens, rainwater harvesting and attenuation ponds. Furthermore whilst the LLFA also note and welcome the inclusion of fluvial and surface water flood risk mapping in the document, this would also benefit from being updated with mapping provided

for all sources of flood risk including groundwater, along with signposting within the document to further guidance documents available relating to surface water drainage and SuDS such as the latest version of 'Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document'.

- 2.4. The LLFA welcome references are retained to the Neighbourhood Plan Regulation 16 Document complimenting Strategic Policies included within the Breckland Local Plan and National Planning Policy Framework (NPPF).
- 2.5. The LLFA are not aware of AW DG5 records within the Parish of Yaxham, however, this will need to be confirmed with/by Anglian Water.
- 2.6. The LLFA still recommend reference be made to the 'Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document within the Neighbourhood Plan (the most relevant updated version depending on the timeframe for the preparation and adoption of the final Neighbourhood Plan document) regarding surface water risk and drainage for any allocated sites or areas of proposed development, available from the ["Information for developers" section of the Norfolk County Council website.](#)
- 2.7. According to LLFA datasets (extending from 2011 to present day) we have 1 no. record of internal flooding and 4 no. records of external/anecdotal flooding in the Parish of Yaxham. 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. We note that all external flood events are deemed anecdotal and have not been subject to an investigation by the LLFA.
- 2.8. We advise that Norfolk County Council (NCC), as the LLFA for Norfolk, publish completed flood investigation reports [here](#).
- 2.9. According to Environment Agency datasets, there are significant areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parish of Yaxham.
- 2.10. The LLFA note that some flood risk mapping has been included in the document. The LLFA recommend that up-to-date mapping be provided for all sources of flooding, with any mapping covering the entirety of the 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](#)

LLFA Review of Local Green Spaces (LGS)

2.11. The document proposes 5 no. Local Green Spaces (1 additional from the Regulation 14 stage) which are identified in Policy ENV3: Green Infrastructure and Map 12. It is understood that designation of LGSs provides a level of protection against development. The LLFA do not normally comment in LGSs unless they are/are proposed to be part of a SuDS or contribute to current surface water management/land drainage. If it is believed that a designated LGS forms part of a SuDS or contributes to current surface water management/land drainage, this should be appropriately evidenced within the submitted Neighbourhood Plan. The LLFA have no comments to make on the proposed LGSs in the plan.

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

3. Transport

3.1. Comments from the Highway Authority have not been incorporated into the Regulation 16 Neighbourhood Plan document. Previous comments relating to the local green space designations were *'Sites 1, 3, and 4 interface with roads, which include dedicated highway land, while Site 2 is entirely a highway. The policy should allow land use for highway functions without restrictions.'*

3.2. The Highway Authority objects to the designation of sites 1, 3, and 4 which is designated across part of the highway. The Highway Authority also objects to the designation of site 2 which is entirely highway. The objection of local green space site 1, 2, 3, and 4 is due to the sites proposed to be designated on highway land as this land forms part of the public highway. Any designation as local green space may limit the ability for NCC to fulfil its statutory duties with regard to highway improvements, management and maintenance.

3.3. Therefore, site 1, 2, 3 and 4 must be removed as LGS designations.



