



Norfolk County Council

Norfolk County Council Comments on the: Swanton Morley Neighbourhood Plan Review (Regulation 16)

04 February 2026

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 Plan to date.

2. General Comments

- 2.1 As the qualifying body may be aware on 16 December 2025 the Ministry of Housing Communities & Local Government (MHCLG) launched its consultation of the [proposed reforms to the National Planning Policy Framework \(NPPF\) and other changes to the planning system](#). This is still live and the deadline for this consultation is the 10 March 2026. This may have implications to the submission version of the Neighbourhood Plan (NP). For example, policy wording and supporting text may need to be altered throughout where NPPF paragraph numbers have been quoted if a new version of the NPPF is published before the NP has reached examination. The Neighbourhood Plan should also updated text and references in relation to the adopted Breckland Local Plan.
- 2.2 As a general point, we would suggest that the quality of the maps within the NP are improved since in the PDF document these are not particularly clear. It would be useful if the maps also included a key.
- 2.3 It is noted that in the executive summary and Appendix C: Parish Council Modification Statement it states: "*The Swanton Morley Neighbourhood Plan contains policies in relation to: - Bringing local accountability for the delivery of planning obligations*". It may be useful to refer to the Norfolk County Council Planning Obligation Standards in the supporting text where relevant- [Planning obligations - Norfolk County Council](#).

3. Lead Local Flood Authority (LLFA)

- 3.1 The LLFA comments on the changes proposed to the Swanton Morley Neighbourhood Plan are as follows:
- 3.2 Update text and references in relation to the current updated National Planning Policy Framework (NPPF) and the adopted Breckland Local Plan – The changes

are noted by the LLFA. The LLFA advise that a government consultation on proposed updates to the NPPF was launched on 16th December 2025 which is still live and may become relevant depending on the timelines of the Neighbourhood Plan review.

3.3 Designating four additional new sites as Local Green Spaces (LGS) – The LLFA note that as was the case at Regulation 14 stage, 4 no. additional Local Green Spaces are proposed as set out in Policy 7: Local Green Space and Maps 8b, 8C, 8d and 8e of the Regulation 16 document. 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 additional LGSs in the plan.

3.4 New and Updated Policies as part of the Neighbourhood Plan Review – The LLFA note the amendments proposed to a number of policies including Policy 1: Protecting the Identify of Swanton Morley and Policy 7: Local Green Space, along with new policies proposed including Policy 17 Commercial Scale Solar and Wind Electricity Generation, Policy 18: Parking Provision, Policy 19: Provision of Street-lighting and Policy 20: Management of Community Infrastructure which do not directly relate to matters for consideration by the LLFA. As such the LLFA have no comments to make on these changes or new policies proposed.

3.5 General comments and observations – The LLFA welcome the retention of Policy 12: Flooding which directly relates to flood risk and makes references to the inclusion of SuDS within new developments, the need to consider flood risk and mitigation resulting from a from various sources of flood risk and take into account the implications of climate change. As advised at Regulation 14 stage, the LLFA suggest that development as are considered based on the latest EA mapping and guidance available from organisations including '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. The LLFA note that the supporting text for Policy 12 makes reference to Policy 14 in paragraph 6.199, which we believe may be an error (and should instead be Policy 12).

3.6 Conformity with Development Plans and Planning Policy - The LLFA welcome references are retained to the Neighbourhood Plan Document complimenting Strategic Policies included within the Breckland Local Plan and National Planning Policy Framework (NPPF).

- 3.7 The LLFA are not aware of AW DG5 records within the Parish of Swanton Morley, however, this will need to be confirmed with/by Anglian Water.
- 3.8 According to LLFA datasets (extending from 2011 to present day) we have no records of internal flooding and 5 no. records of external/anecdotal flooding in the Parish of Swanton Morley. 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.
- 3.9 We advise that Norfolk County Council (NCC), as the LLFA for Norfolk, publish completed flood investigation reports [here](#).
- 3.10 According to Environment Agency datasets, there are areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parish of Swanton Morley.
- 3.11 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](#)
- 3.12 Allocation of Sites- We would expect that the Neighbourhood Planning Process provide a robust assessment of the risk of flooding, from all sources, when allocating sites. It is not evident to the LLFA that this has been undertaken in respect of any site allocations (in this instance it is understood by the LLFA that whilst no housing allocations directly form part of the Neighbourhood Plan, Breckland Local Plan Preferred Allocated sites have however been included and considered). If a risk of flooding is identified then a sequential test, and exception test where required, should be undertaken. This would be in line with Planning Practice Guidance to ensure that new development is steered to the lowest areas of flood risk. However, any allocated sites will also still be required to provide a flood risk assessment and / or drainage strategy through the development management planning process.
- 3.13 Should you have any queries with the above comments please contact the Lead Local Flood Authority at llfa@norfolk.gov.uk.

4. Minerals and Waste

4.1 Our only comment on the Swanton Morley Neighbourhood Plan is that paragraph 5.4.2 lists the documents that form the development plan for Breckland but omits the Norfolk Minerals and Waste Local Plan. The Norfolk Minerals and Waste Local Plan should be included in the list in 5.4.2 because it forms part of the development plan for Norfolk.

5. Major and Estate Development

5.1. The Highway Authority has no objection to the four specified green space allocations and no objection policy B: Parking Provision. The allocated residential parking requirements are in excess of Norfolk County Council's "Parking Guidelines for new developments in Norfolk" guidance. Obviously, the HA wouldn't object to additional parking spaces being provided, but developers may resist providing the number of parking spaces specified within the NP policy.

5.2. Should you have any queries with the above comments please contact Stuart Blake (Engineer - Major and Estate Development) at stuart.blake@norfolk.gov.uk.

6. Historic Environment

6.1 The Reg 16 draft contains little mention of the historic environment, especially buried remains. As such we wish to give the following advice:

- Historic England's published guidance on the preparation of Neighbourhood Plans (<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>) encourages the full consideration of heritage assets and suggests ways in which this can be achieved.
- Based on this guidance, we would like to suggest the authors of the plan follow a number of steps:
- Study Historic England's published guidance and consider how the plan can take its advice on board.
- Contact the Norfolk Historic Environment Record and request information on heritage assets within the plan area. The NHER can be contacted at heritage@norfolk.gov.uk.
- 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.

6.2 Should you have any queries with the above comments please contact Steve Hickling (Historic Environment Officer) at steve.hickling@norfolk.gov.uk

7. Natural Environment Team

7.1. No comments.

8 Norfolk Fire and Rescue Service

8.1 No comments.