



# Norfolk County Council

## Norfolk County Council Comments on the: Marshland St James Neighbourhood Plan (Reg 16) 13 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. Historic Environment

- 2.1. Thank you for consulting us on the above neighbourhood development plan.
- 2.2. 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.
- 2.3. 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 [REDACTED]
  - 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.
  - Directly consult the Historic Environment Service's planning advice team [REDACTED] for advice.
- 2.4. Should you have any queries with the above comments please contact Steve Hickling (Historic Environment Officer) at [REDACTED] or call 01362 869285.

### 3. Lead Local Flood Authority

- 3.1. Thank you for your consultation on the Marshland St James Neighbourhood Plan Review 2022 - 2038 Regulation 15 Version and supporting documents (LLFA Reference: FW2025\_0274) received by the LLFA on 8<sup>th</sup> April 2025. From

our records it does not appear that the LLFA were previously consulted on this Neighbourhood Plan at the Regulation 14 stage.

- 3.2. The LLFA comments at Regulation 16 stage are as follows:
- 3.3. The LLFA welcomes that the Marshland St James Neighbourhood Plan Review 2022 - 2038 Regulation 15 Version and its policies make references to flooding from various sources such as surface water, coastal and fluvial flooding and to the implications of climate change upon development and flood risk, although we note that this is relatively limited in scope with no reference made to other sources of flood risk such as groundwater and no relevant EA mapping included covering the Neighbourhood Plan area. Of the policies included in the Regulation 16 document, Policy MSJ5: Design and MSJ6: Residential Parking Requirements, are of most relevance to matters for consideration by the LLFA.
- 3.4. The LLFA particularly welcomes the inclusion of Policy MSJ5: Design in the Neighbourhood Plan in which criteria J seeks to ensure new development does not result in a detrimental impact on the environment and water infrastructure, including sewers and surface water and other flooding.
- 3.5. Furthermore, the LLFA welcome the inclusion of Policy MSJ6: Residential Parking Requirements which states that parking areas and driveways should be constructed using sustainable materials, such as permeable paving, to reduce the impact of impermeable surfaces on drainage systems and improve the environmental quality of the development.
- 3.6. Notwithstanding the policies referred to above, the LLFA advise that the Marshland St James Neighbourhood Plan would benefit from the inclusion of a separate policy relating to Flood Risk Management, relating to all sources such as surface water, supported by up to date mapping, or enhancements made to the existing policies in respect of flood risk and incorporating Sustainable Drainage Systems (SuDS) into proposals, highlighting the wider benefits of doing so such as amenity and biodiversity. The LLFA note that the term 'SuDS' has been defined in the glossary section however we advise that the term no longer makes reference to 'Urban' given that Sustainable Drainage is applicable in both urban and rural settings.
- 3.7. The LLFA note whilst not referred to in the document, that our records indicate that there are numerous drainage ditches in the Parish, along with number of ordinary watercourses, which fall within the Kings Lynn Internal Board and the Downham and Stow Bardolph.
- 3.8. The LLFA also welcomes references made to the Marshland St James Neighbourhood Plan Regulation 16 Document complimenting Strategic Policies included those within the Borough of Kings Lynn and West Norfolk Local Plan and National Planning Policy Framework (NPPF).

- 3.9. The LLFA are not aware of AW DG5 records within the Parish of Marshland St James, however, this will need to be confirmed with/by Anglian Water.
- 3.10. The LLFA recommends reference be made in the document to guidance available from organisations such as 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.](#)
- 3.11. According to LLFA datasets (extending from 2011 to present day) we have no records of internal flooding and 2 no. records of external/anecdotal flooding in the Parish of Marshland St James. 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.
- 3.12. We advise that Norfolk County Council (NCC), as the LLFA for Norfolk, publish completed flood investigation reports [here](#).
- 3.13. According to Environment Agency datasets, there are areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parish of Marshland St James.
- 3.14. The LLFA note no flood risk mapping has been included in the document relating to fluvial and coastal flooding. The LLFA recommend that 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](#)
- 3.15. **Allocation of Sites**
- 3.16. 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 noted that no housing allocations form part of the Neighbourhood Plan). 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.

### **3.17. LLFA Review of Local Green Spaces (LGS)**

3.18. The document does not appear to propose any changes to Local Green Spaces. 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.

3.19. Should you have any queries with the above comments please contact the Lead Local Flood Authority at [REDACTED]

## **4. Public Health**

4.1. The authors of the reports may find it helpful to consult the attached (appendix a) Health in Neighbourhood Plans guidance, which supports communities to embed health in their plans and includes examples of good practice.

4.2. If they have any specific questions regarding this, they are welcome to contact us at [REDACTED]