



Norfolk County Council

Norfolk County Council Comments on the: Syderstone 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. Thanks for consulting us about the above neighbourhood plan.
- 2.2. The plan appears to handle the subject of the historic environment well and shows that some research has taken place. However, we would like a statement recognising that all planning applications within the parish are examined by the Norfolk County Council Historic Environment Strategy and Advice Team and archaeological mitigation recommended when required.
- 2.3. 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 Syderstone Neighbourhood Plan 2022 - 2038 Regulation 15 Version February 2025 (Regulation 16) and supporting documents (LLFA Reference: FW2025_0275) received by the LLFA on 8th April 2025. The LLFA note that we do not appear to have previously been consulted or provided comments based on any earlier revisions of the Syderstone Neighbourhood Plan.
- 3.2. The LLFA comments at Regulation 16 stage are as follows:
- 3.3. Whilst the LLFA welcomes that the Syderstone Neighbourhood Plan 2022 - 2038 Regulation 15 Version February 2025 (Regulation 16) and its 11 no. proposed policies make references to flooding from various sources such as surface water, ground water and fluvial flooding and to the implications of climate change upon development and flood risk, although we note that the scope is somewhat limited. It is also no comprehensive mapping for any sources of flood risk has been included. Policy 1: Syderstone's General Design Codes, Policy 5: Biodiversity and Green Ecological Corridors and Policy 7:

Local Green Spaces, which are of most relevance to matters for consideration by the LLFA.

- 3.4. The LLFA welcomes the inclusion of Policy 1: Syderstone's General Design Codes and its supporting text in respect of flood risk and references ensuring new and existing development does not result in detrimental impacts on the environment and water infrastructure, including sewers and surface water and other flooding, with reference made to the use of permeable areas to reduce the risks and impacts from flooding, along with flood resistance measures and rainwater harvesting. Notwithstanding this, the LLFA would welcome the inclusion of a policy in the Neighbourhood Plan relating to flood risk and references made to the consideration of all sources of flood risk including fluvial, surface water and groundwater, including up-to-date EA mapping covering the whole Parish, along with references to guidance available from organisations such as the LLFA and EA in respect of flood risk.
- 3.5. Whilst the LLFA notes reference made to SuDS in the document glossary, no other references appear to have been made in the document or its policies to the inclusion and benefits of Sustainable Drainage Systems (SuDS). The LLFA advise that the term SuDS no longer makes reference to 'Urban' given that Sustainable Drainage is applicable in both urban and rural settings.
- 3.6. The LLFA welcome references made to the Syderstone 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).
- 3.7. The LLFA are not aware of AW DG5 records within the Parish of Syderstone, however, this will need to be confirmed with/by Anglian Water.
- 3.8. The LLFA recommends that 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.
- 3.9. According to LLFA datasets (extending from 2011 to present day) we have no records of internal flooding or external/anecdotal flooding in the Parish of Syderstone. 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.

3.10. We advise that Norfolk County Council (NNC), as the LLFA for Norfolk, publish completed flood investigation reports here.

3.11. According to Environment Agency datasets, there are areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parish of Syderstone.

3.12. The LLFA note that no flood risk mapping has been included in the document. 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](#)

3.13. Allocation of Sites:

3.14. 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.

3.15. LLFA Review of Local Green Spaces (LGS):

3.16. The document proposes 6 no. Local Green Spaces which are identified in Policy 7: Local Green Spaces and Figure 23. 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.

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

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 phplanning@norfolk.gov.uk